



Housing and Homelessness Division
Kitsap County Department of Human Services

KITSAP GRANT GUIDELINES for

Emergency Solutions Grant - Coronavirus
(ESG-CV)

Including Written Standards

Version 11/4/2022

Contents

Overview	1
Funding Sources	1
Kitsap County’s Use of ESG-CV Funds & Types of Projects Funded.....	1
Service Area.....	2
Contracting	2
Allowable Contract Activities	2
Allowable Uses of Funds.....	3
Allowable Contract Expenses	4
Reimbursement Requests.....	4
Program Administrative Policies.....	8
Sub-sub recipient Administrative Requirements.....	11
Provision of Services Requirements.....	18
Housing & Homelessness Division Complaint Policy and Procedure.....	19

Overview

The Housing and Homelessness Division of the Kitsap County Department of Human Services was granted the Emergency Solutions Grant – Coronavirus (ESG-CV) funding from the Washington State Department of Commerce, who received an allocation of these funds from HUD. These funds were granted for the purpose of supporting activities that will reduce the impact of COVID-19 on Kitsap residents who are experiencing homelessness or housing instability.

These Guidelines and Written Standards are intended to meet the HUD ESG-CV requirements and to provide guidance for organizations that contract with the Division for these grant funds to achieve this purpose.

Funding Sources

EMERGENCY SOLUTIONS GRANT – CORONAVIRUS

Emergency Solutions Grant – Coronavirus (ESG-CV) 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.

ESG-CV 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 HUD regulation and Commerce’s ESG-CV Guidelines and Kitsap County’s ESG-CV Guidelines.

Kitsap County’s Use of ESG-CV Funds & Types of Projects Funded

Kitsap County has prioritized using ESG-CV funding for the following purposes in order to prevent and respond to the spread of COVID-19:

- Provide funding for operations and case management for sheltering people experiencing homelessness;
- Provide funding for rapid-rehousing operations, other financial assistance, and case management;
- Provide funding for prevention program operations, case management, and other financial assistance.

In accordance with Commerce’s requirement to assist youth and young adults with this funding, Kitsap County is also prioritizing funding for the Foster Youth Independence Program, providing rapid re-housing and prevention for youth and young adults who are transitioning from the foster care system to independent housing.

Sub-contractors will ensure that ESG-CV-funded programs will:

- Not discriminate against households in provision of services based on health status.

- Whenever possible, move COVID affected clients to locations where they are not at risk of spreading the infection further.
- Provide training to all staff on how to prevent, prepare and respond to COVID.
- Ensure that mitigation practices are effectively implemented by collaborating with public health officials in disseminating information and resources to those experiencing homelessness.
- Whenever possible, move COVID affected clients to locations where they are not at risk of spreading the infection further.
- Ensure that program staff have the necessary supplies in stock to maintain a disease-free environment.
- Care for individuals who are sick, including arranging transportation, securing a safe location where people can stay during illness. If clients are quarantining, they are provided with food, laundry, clothing, prescriptions, and case management to determine and direct clients to needed services. Programs must work with local agencies to help provide quick access to needed care for those experiencing homelessness.

Service Area

ESG-CV funds will be used to benefit residents throughout all of Kitsap County.

Contracting

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.

Allowable Contract Activities

ELIGIBLE ACTIVITIES AND SERVICES

Eligible activities and services for ESG-CV funded projects are identified in Commerce’s ESG-CV Guidelines and HUD Guidance.

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

Kitsap County has prioritized ESG-CV funds for the following types of projects:

Emergency Shelter (Hotel/Motel) – Kitsap County has determined that the existing stock of emergency shelter beds is not sufficient to implement safety protocols related to COVID-19, so hotel/motel rooms were identified to allow people to be sheltered while staying healthy. Other emergency shelter options

such as churches and public spaces were explored but are not available to meet the need of the community.

Sub-sub-recipients must negotiate room rates with the hotel/motel owner that are reasonable in cost as compared with other hotels/motels in the area.

Homelessness Prevention (HP) and Rapid Rehousing (RRH) – Kitsap County has determined that a key strategy to reducing the spread of COVID-19 is to provide stable housing for households through prevention and rapid re-housing programs.

ESG-CV funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent a household from moving into an emergency shelter or unsheltered homelessness.

Prevention costs are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing.

Allowable Uses of Funds

ESG-CV 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 ESG-CV Guidelines and Kitsap County’s ESG-CV 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.

HOUSEHOLD INCOME ELIGIBILITY AND PRIORITIZATION

Household eligibility for ESG-CV projects is outlined in the most current version of Commerce’s ESG-CV Guidelines and HUD Guidance.

Homelessness Status -- Sub-sub-recipients must verify and document a program participant’s homelessness status at intake. The order of priority for obtaining verification of housing status is:

- Third party documentation including written and source documentation and HMIS records;
- Intake worker observations;
- Certification from households seeking assistance.

Lack of third-party documentation must not prevent a household from receiving services.

Rapid Re-housing programs are available for people who are literally homeless according to HUD’s definition. ESG-CV rent assistance programs should be prioritized for households with the longest history of homelessness and for households with the most severe service needs including COVID-19 related needs.

Homelessness Prevention programs are for people who are at imminent risk of homelessness or at-risk of homelessness, according to HUD’s definition. Prioritization for homeless prevention programs are households earning less than 50% of Area Median Income (AMI) who are determined to have no alternative housing resources.

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 ESG-CV Guidelines, HUD regulations, and other accompanying Q&A or guidance from these entities.

ESG-CV grantees will have multiple budget line items which may be found on the contract budget. Allowable expense cost categories, definitions, and examples can be found in Commerce’s ESG-CV Guidelines.

Hazard Pay – If a sub-sub-recipient uses ESG-CV funding to pay hazard pay to staff working within an ESG-CV project, the sub-sub-recipient must have a written Hazard Pay Policy that includes:

- A description of staff receiving hazard pay and how their work is directly related to carrying out ESG-CV eligible costs;
- How hazard pay fits within the agency’s other established written compensation policies;
- Explanation of how the hazard pay is equitably allocated to all related activities;
- Documentation that the hazard pay is reasonable; and
- The timeframe that the hazard pay is being offered.
- Documentation that indicates that the temporary pay increases correspond with a period in which the staff person works directly to prevent, prepare for, and respond to COVID-19.

Reimbursement Requests

Reimbursement requests should be submitted monthly no later than the 14th day of the following month.

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.

REIMBURSEMENT REQUEST PROCESS

Reimbursement requests must be submitted using the following electronic process:

1. **Submit an invoice packet**, including all required paperwork.
 - a. **ESG-CV 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 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, or (360) 337-7289.

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.

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 for the reimbursement 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 ESG-CV 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”).

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

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.

DOCUMENTATION

For ESG-CV 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.

Program Administrative Policies

CONFLICT OF INTEREST

Kitsap County employees are subject to the following Conflict of Interest Policies contained in Chapter 9, Section D of the Kitsap County Personnel Manual (updated 2/28/22):

1. Purpose: Public confidence of the citizens of Kitsap County in the operation of their County government is built on integrity. Accordingly, each employee must maintain high standards of personal conduct in his/her relationships with the public and with working associates.
2. Confidential Information: Many of the operations of the County are considered public information, but some are not. The confidential business of the County should not be discussed with anyone who does not need to be consulted with or made aware of the confidential information to further the County's interests. Providing confidential information to unauthorized persons may be grounds for disciplinary action. If you are unsure, contact your supervisor. Even if the information is subject to public disclosure, employees may not independently disclose such information. See RCW 42.23.070.
3. Loans, Gifts, Gratuities, Etc.: Kitsap County employees must not directly or indirectly give or accept or agree to accept any compensation, gift, reward or gratuity in the course of their work responsibilities from any source other than Kitsap County. See RCW 42.23.070
4. Outside Employment: a. Employees shall not directly or indirectly engage in any outside employment or financial interest which may conflict, in the County's opinion, with the best interests of the County or interfere with the employee's ability to perform his/her assigned County job. Examples include, but are not limited to, outside employment which:
 - i. Prevents the employee from being available for work beyond normal working hours, such as emergencies or peak work periods, when such availability is a regular part of the employee's job.
 - ii. Is conducted during the employee's work hours.
 - iii. Utilizes County telephones, computers, supplies or any other resources, facilities or equipment.
 - iv. Is employed with a firm which has contracts with or does business with the County.
 - v. May reasonably be perceived by members of the public as a conflict of interest or otherwise discredit public service.
 - vi. Which might require or induce the employee to disclose confidential information acquired by reason of the employee's official position.
 - vii. An employee who chooses to have an additional job, contractual commitment or self-employment that does not conflict with their position, may do so provided they obtain prior written approval from their Employing Official.
5. Political Activities: Kitsap County employees have the same right to campaign in support of, or in opposition to, a candidate or a ballot proposition as any other citizen. However, since the County receives federal funds, employees whose compensation is derived in part from those funds are subject to the Hatch Act, which places restrictions on their political activities. Regardless of funding source, no public funds and facilities may be used, nor may an employee

campaign on County time or while representing the County in any way. a. Examples of prohibited activities include, but are not limited to:

- i. Using County stationery, letterhead, postage or copying equipment to prepare and mail campaign literature.
 - ii. Publishing a statement supporting a candidate in the County newsletter or other departmental newsletters, or including such a statement on or with any utility billing.
 - iii. Campaigning by County employees on County time.
 - iv. Using County facilities and equipment to make calls in support of a candidate at any time.
 - v. Using County vehicles to attend rallies, drop off mailers at a printer or distribute campaign materials.
 - vi. Holding campaign meetings in any County building or office.
 - vii. Wearing a County uniform or badge while campaigning.
6. The use of County facilities for non-county business is prohibited.

RISK ASSESSMENTS

The County will 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.

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. Sub-sub recipients will be contacted to schedule monitoring and provided with a checklist of monitoring components.

After compliance monitoring, sub-sub recipients will be provided with a completed monitoring checklist and a list of required follow-up actions. Sub-sub recipients 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.

ESG-CV sub-sub-sub recipients may also be monitored by the Department of Commerce in accordance with the Commerce ESG-CV Guidelines.

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-sub-sub recipients, 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 program 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.
- ESG-CV sub-sub-sub recipients 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 ESG-CV 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-sub-sub recipients 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.

Sub-sub recipient Administrative Requirements

ESG-CV FORMS AND AVAILABILITY

ESG-CV-funded program will use ESG-CV Forms provided by Commerce as outlined in Appendix A of Commerce's ESG-CV Guidelines.

RENTAL ASSISTANCE AGREEMENTS AND LEASES

Rental Assistance Agreements and Leases are required between the sub-sub recipient and the property owner in order to provide rental assistance. Please refer to Commerce's ESG-CV Guidelines for additional information.

INSURANCE CERTIFICATES

As specified in grant contracts, sub-sub recipients 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.

REQUIRED POLICIES AND PROCEDURES

Pursuant to HUD and Commerce requirements, sub-sub recipients must have the following written policies in place. These written policies may be requested by the Housing and Homelessness Division for review at any time.

Non-Discrimination Policies – Sub-sub recipients must have a written non-discrimination policy, available for review upon request.

Sub-sub recipients must comply with all federal, state, and local nondiscrimination laws, regulations, and policies.

Sub-sub recipients 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.

Sub-sub recipients 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.

Grievance Policy and Procedure – Sub-sub recipients 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.

A signed acknowledgement of the Grievance Policy and Procedure should be included in each client's file.

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?);
- the right of the participant to contact the Agency's director, the Department of Commerce, or HUD;
- 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.

The policy must include information about cases where the grievance is related to denial of service or termination from the program, including:

- the right of program participants to contest and appeal any decision that denies (for any reason), limits eligibility of a participant, or terminates or modifies levels of assistance;
- the right of program participants to have due process;
- that the program participant will receive written notice clearly stating the reasons for termination;
- a pathway for the program participant to have the decision reviewed that gives them the

opportunity to present objections to the decision and to have representation (such an appeal shall be heard by an individual other than and not subordinate to the initial decision-maker);

- that prompt written notice of the final decision in the appeal will be provided; and
- that termination will not bar the agency from providing assistance to the individual or family in the future.

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. Program participants must be provided with the Termination and Denial of Service Policy along with examples of the kinds of things that will cause them to be denied service or terminated from the program

Sub-sub recipients must exercise judgement and examine all extenuating circumstances in determining when violations warrant termination so that a program participant is terminated from the program in only the most severe cases and after all other remedies have been attempted.

The policy must outline an established process that recognizes the rights of the individuals affected and must be applied consistently.

Eligibility Policy – Program eligibility will be determined based on the ESG-CV application form and other documentation submitted by the tenant in accordance with Commerce ESG-CV Guidelines and HUD Guidance. If an applicant is not eligible for the ESG-CV program, then they will be considered for eligibility for other rental assistance/eviction prevention programs if such programs are available. Grantees must document any additional procedures and policies for determining a household's eligibility for eviction assistance and/or utilities assistance.

Prioritization Policy – Prioritization for receiving ESG-CV assistance is outlined in this document under the Household Eligibility and Prioritization section. If any additional prioritization is added at the organizational level, the sub-sub-recipient must receive prior approval from Kitsap County and the sub-sub recipient's policy must include how the organization determines the prioritization of households for services in compliance with the Commerce and HUD ESG-CV guidance.

Prioritization Policy must be aligned with CDC recommendations for people at risk of severe illness if they contract COVID-19. The policy should be aligned with Washington State Coordinated Entry Requirements and the Kitsap CE program (Housing Solutions Center), including and prioritization for those at high risk for severe illness from COVID-19. Policies must be low-barrier.

Unsafe or Unhealthy Living Conditions – Habitability Standards – 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. Policy should outline how the program documents housing inspections and lead-based paint inspections using the ESG Habitability Standards Checklist and Lead-based Paint Visual Inspections Form.

Use of the ESG Habitability Standards Checklist is required for shelter programs (over 30 days stays) and rental assistance programs.

Lead-based Paint Visual Inspections are required. All sub-sub recipients using ESG-CV funding for emergency shelter operations and rental assistance must follow all applicable lead-based paint requirements. Inspections must be conducted by a HUD-certified Visual Assessor prior to program participant move-in. If during the assessment a deteriorated paint surface is discovered, property owners must remedy deteriorated paint surfaces in accordance with 24 CFR 35.1330(a) and (b) before ESG-CV funds can be used in the unit.

Protection of Personally Identifying Information Policy – This policy should address how the organization ensures that personally identifying information of clients is safeguarded, kept under lock and key, and access is restricted to organizational staff working with the client. The policy must demonstrate that the organization is taking reasonable measures to safeguard protected personally identifiable information and other information the Federal, State, or County funder designates as sensitive or consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality of files.

Sub-recipients must follow all state and federal laws governing HMIS, including collecting informed written consent from program participants, not denying service based solely on program participant refusal to provide data for HMIS entry, protecting program participant confidentiality, not collecting personally identifying information from program participants that are victims of domestic violence, and other requirements defined in RCW 43.185C.030, 43.185C.180, and federal Violence Against Women laws.

Conflict of Interest Policy – Kitsap County and its subrecipients are required to maintain written standards governing the performance of their employees engaged in awarding and administering contracts.

At a minimum, the policy must:

- Require that no employee, officer, agent shall participate in the selection, award, or administration of a contract supported by Kitsap County's Housing and Homelessness Division if a conflict-of-interest, either real or apparent, would be involved;
- Require that employees, officers, and agents not accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub agreements;
- Ensure that employee's family members do not receive preferential treatment when receiving benefits from the organization's programs;
- Stipulate provisions for penalties, sanctions, or other disciplinary actions for violations of standards; and
- Indicate the date of Board approval.

A conflict would arise when any of the following has a **financial or other interest** in a firm selected for award:

- An employee, agent, or officer of Kitsap County or subrecipient;
- Any member of an employee's, agent's, or officer's immediate family;
- An employee's, agent's, or officer's partner; or
- An organization that employs or is about to employ an employee, agent, or officer of the County or subrecipient.

Duplication of Benefits Policy – Duplication of benefits occurs when an individual or household receives financial assistance for the same service, during the same time period, from multiple funding sources. Sub-sub recipients must establish and maintain adequate procedures to prevent any duplication of benefits with ESG-CV funds. Policy must include:

- Determination and documentation if the households is receiving assistance from other sources (e.g. FEMA costs for temporary shelter, ERAP CHG, etc.) to avoid duplication of benefits and/or disqualification of the household from assistance.
- Reference any checklists, forms, or tools that are used to evaluate if the household is receiving assistance from other sources
- How the household's benefits are re-checked during any program re-evaluation.
- Any additional sources of financial assistance and services provided to a household must be documented, and a determination must be made that there is no duplication of benefits.

Hazard Pay Policy – Policy must include the following:

- Description of staff receiving hazard pay and how their work is directly related to carrying out ESG-CV eligible costs
- How hazard pay is reflective of established written compensation policies
- Demonstrate that the hazard pay is equitably allocated to all related activities
- Documentation that the hazard pay is reasonable
- Documentation the indicates that temporary pay increases that correspond with a period in which the staff person works directly to prevent, prepare for, and respond to COVID-19.

Emergency Shelter Policies – Emergency Shelter and Temporary Emergency Shelter projects funded with ESG-CV must have written policies describing the following:

- Assessment and Eligibility Process -- The program's assessment process for determining whether an individual or household is selected for the program;
- Admission Requirements -- The admission requirements for the program;
- Involuntary Family Separation Prohibition Policy -- A statement that the age of a child under 18 must not be used as basis for denying any family's admission to the ESG-CV funded shelter program;
- Length of Stay Policy -- Length of stay allowed (if it is limited) and how extensions are requested and determined;
- Quarantine and Isolation Referral Policy -- A description of the referral pathways to isolation and quarantine if a household needs these services;
- Vulnerable Populations Safeguards Policy -- Safeguards to meet the safety and shelter needs of special populations, such as survivors of domestic violence or sexual assault;
- Program Participants Health Monitoring -- How staff monitors program participants for symptoms of COVID-19 and other illness, including mental health and physical health;
- Housing Stability Plan Policy and Procedure -- How staff works with program participants to develop and work on housing stability plans;
- COVID-19 Education Policy -- How staff educates program participants on the need for masks and the use of other personal protective equipment (PPE); and
- Program Discharge Policy -- The criteria/process for discharging participants from the program.

Prevention and Rapid Re-housing Program Policies – Prevention and Rapid Re-housing programs funded with ESG-CV must have written policies describing the following:

- Assessment and Eligibility Process -- How a household's eligibility for the program is determined;
- Prioritization Policy -- How people and households are prioritized for participation in the program;
- Violence Against Women Act (VAWA) Notification Policy – Each applicant for rental assistance and each program participant receiving ESG-CV rental assistance must be provided with the notice and certification form under 24 CFR 5.2005(a)(1). The notice and certification form must be provided each time the household: 1) is denied rental assistance, 2) begins receiving rental assistance, 3) is notified that the rental assistance will be terminated, and 4) receives notification of eviction. For tenant based rental assistance, the policy must specify how the Notice of Rights and certification form is included in rental assistance agreements. A sample Notice of Occupancy Rights under the Violence Against Women Act is available.
- Equal Access Policy -- A statement that a household's lack of income, health status, sexual orientation, or gender identity does not preclude them from participating in the program;
- Housing Benefit Determination Policy -- The standards for determining the type, amount, and duration of housing stabilization and/or relocation services;
- Assistance Limits Policy -- Any limit on the amount of assistance a program participant may receive (a maximum dollar amount, number of months, or number of times);
- Assistance Determination Policy -- The method for determining the amount or percent of rent and utility payments that each household must pay while participating in the ESG-CV program; Standards and procedures for determining the length of time that a program participant will be provided with rental assistance and how the specific participant needs will be assessed over time to potentially adjust the amount of assistance;
- Changes in Program Due to Eviction Moratorium Policy (for Prevention Programs only) -- Any changes in policies, procedures, and documentation when services are being provided during an Eviction Moratorium, including procedures that detail "reasonable assistance" provided to the household if they are being evicted for non-payment of rent (e.g. policies for attempts to contact landlords and alternative resources that the household can be referred to), and documentation of circumstances required to be collected;
- Rent Reasonableness Policy -- Documentation of how the agency will document rent reasonableness, including:
 - A methodology for documenting comparable rents
 - A casefile checklist and forms
 - Standards for certifying comparable rents as reasonable
- Lead-based Paint Inspection Policy -- Standards and procedures for documenting lead-based paint inspections and housing inspections, referencing the federal Lead-Based Paint Poisoning Prevention Act and the Lead-Based Paint Hazard Reduction Act of 1992 and all other pertinent regulations.
- Length of Assistance Policy – Standards for determining how long a program participant will be provided with rental assistance and how the participant need will be assessed and assistance adjusted over time. Statement of the maximum period of assistance (e.g. number of months) and whether this has been adjusted to address COVID-19-related unemployment, loss of income, or benefits;
- Participant Re-evaluation Policy -- Standards and procedures for re-evaluating a program participant's eligibility, including how often re-evaluation occurs; Low-barrier Policy -- Statement that program participants are not required to participate in treatment or any other prerequisite activities as a condition of receiving assistance;

- Progressive Engagement Policy – How the program uses progressive engagement with program participants;
- Program Discharge Policy – Description of how the program when a participant is discharged from the program;
- Landlord Incentives Policy -- If landlord incentives are part of the program, include policies and procedures governing the use of landlord incentives, including eligible types of incentives, documentation of the reasonableness and appropriateness of the amount of the incentives, documentation that the incentives are necessary to obtain housing for program participants, and the total for all incentives does not exceed three times the monthly rent.

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

REPORTING REQUIREMENTS

Reporting for ESG-CV grants is as follows:

- 1) All ESG-CV sub-sub recipients must provide a summary of activities and the number of households assisted with each reimbursement request on the Summary Statement of Expenses.
- 2) At the conclusion of the grant period, all sub-sub recipients will be required to submit a completed simple ESG-CV Grant Final Report Form.

CLIENT FILES

Contractors are required to keep a file on each client that is served through their funded program. These files may be in electronic or paper format. Client files should include things like the completed program application, income verification (if applicable), referral information, program consent forms, case management notes, lease agreements, etc.

Client files must be produced at the request of the Housing and Homelessness Division and will be reviewed during the program monitoring site visits.

Client files must be stored in a secure area with access limited to designated personnel.

Client files should be retained for a minimum of seven years in a secure location.

Additional information about client files and record-keeping for ESG-CV projects can be found in Commerce’s ESG-V Guidelines.

HMIS REQUIREMENTS

Sub-sub-recipients must enter client data into the Homeless Management Information System (HMIS) for all clients served through ESG-CV funded projects in accordance with the most current HMIS Data Standards and the ESG Program HMIS Manual.

Client data should be entered into HMIS as close to the date of collection as possible. This supports data quality by avoiding backlogs of pending data and allowing near real time analysis and reporting.

All clients entered into HMIS must sign the latest version of the Kitsap County HMIS Consent Form. This form must be kept in the client file.

Information about HMIS data collection and quality requirements is available in Commerce’s ESG-CV Guidelines.

RECORDS MAINTENANCE AND DESTRUCTION

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

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.

COMMERCE REQUIREMENTS

Sub-sub recipients must also abide by all Department of Commerce requirements for these funds, as outlined in Commerce’s ESG-CV Guidelines and corollary Q&A documentation. Such requirements will be provided to sub-sub recipients by the Housing and Homelessness Division.

UPDATES TO ESG-CV GUIDELINES

Kitsap County may issue periodic updates to ESG-CV Guidelines as availability of funding, or local policies or procedures change. ESG-CV sub-sub recipients are responsible for following the most recent ESG-CV Guidelines, which will be available at: <https://www.kitsapgov.com/hs/Pages/HH-Grant-Recipients-page.aspx>

Provision of Services Requirements

COORDINATED ENTRY

ESG-CV funded projects are required to participate in Kitsap’s coordinated entry program and take referrals exclusively through the coordinated entry program.

Programs serving survivors of domestic violence may intake clients directly, but clients should be directed to go to the coordinated entry program as soon as possible and within three days of program entry.

LOW BARRIER SERVICES

ESG-CV funded projects must not condition receiving services on a program participant taking part in treatment or any other pre-requisite activities, including housing case management. Policies should not place a burden on people accessing housing or shelter for maintaining their placement in the program.

RELIGIOUS REQUIREMENTS PROHIBITED

Sub-sub recipients 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.

COVID-19 RECOMMENDATIONS

Sub-sub recipients 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.

Housing & 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.

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.