



King County

King County
Department of Community and Human Services
Community Services Division
Housing and Community Development Program

King County

FAQs

**(Frequently Asked Questions)
And What's New**

FOR THE

Consolidated Homeless Grant (CHG) Guidelines

Revised March 1, 2022

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1 Grant Basics

1.1 Overview and What's New

3/1/22: Question: Are these Guidelines on-line?

Answer: The King County CHG guidelines, FAQs and forms are posted on the King County website at www.KingCounty.gov/CSDContracts (Click on “Homeless and Housing Programs” at top right. Then click on the plus sign next to the heading: “Grant Guidelines and FAQs”). There you will find:

- King County Consolidated Homeless Grant Guidelines (March 2022)
- Frequently Asked Questions (FAQs) & What's New in the King County CHG Guidelines. (March 2022)
- King County CHG Required Forms (refer to checklist for requirements for your program type). (March 2022)
 - Prevention Programs CHG required forms (March 2022)
 - Rapid Rehousing CHG required forms (March 2022)
 - Transitional and PSH required forms for CHG (March 2022)

We appreciate your time in downloading and reviewing these updated guidelines and incorporating these updated forms and documentation requirements in your client files going forward. We encourage you to refer to the details of your contract for specifics. Please contact your contract monitor if you have questions, or if you have trouble accessing the documents on the website or opening the zip file. Keep in mind that King County will update these guidelines, from time to time.

3/1/22: Question: What is new in the March 2022 revised Guidelines and Forms?

Answer:

Changes to Forms:

- The Income Eligibility Verification Form has been updated with these changes:
 - 2021 income limits added.
- The Rental Subsidy Calculation Form has been updated to reflect the 2021 income limits and 2022 Fair Market Rents
- Zipped Forms available on the King County website by program type:
 - RRH Required Forms
 - Prevention Required Forms
 - Transitional & PSH Required Forms
 - Shelter Required Forms

Changes to Guidelines:

- **Section 1. Overview:** Added: “King County and the King County Regional Homeless Authority (KCRHA) each have contracts with subgrantee agencies that reference the King County CHG Guidelines. References in these guidelines to “your funder” refers to the funding entity that holds your contract.”
- **Section 4. Household Eligibility:** Revised to remove references to HEN Essential Needs Assistance. Use Flex Funding instead.
- **Section 4.3 Income Eligibility:** Revised to reflect the 2021 income limits, to add this additional language, and to remove references to TANF enrollment or General Assistance enrollment:

HUD anticipates that the 2022 income limits will be published in April, 2022 at

2021 Income Limits for King County

Effective April 5, 2021

Household Size	1	2	3	4	5	6	7	8
Extremely Low (30%)	24,300	27,800	31,250	34,700	37,500	40,300	43,050	45,850

Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, www.ecfr.gov, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section [5.609 Annual Income](#).

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

Current Income is the income that the household is currently receiving. Income recently terminated should not be included.

- **Section 4.4 Documentation of Income Eligibility** revised to include updated information about the DSHS Benefits Verification System
- **New Section 4.4.1 Documentation of HEN Referrals**
- **Section 4.5 Income Eligibility Recertification** revised to say that this is not required for HEN households who are PWA recipient up to 24 months.
- **New Section 4.6.1 Eligibility for Permanent Supportive Housing for Chronically Homeless Families (PSH CHF)**
- **Section 4.7 Definition of Households with Minor Children** added this language:
Partial custody: Households with partial custody of their only children for less than 51% of the time may only be enrolled upon written funder pre-authorization and must take partial custody into consideration when determining unit size.
- **Section 5.1. Administration Expenses.** Added this language: Administrative costs may include the same types of expenses that are listed in program operations (such as IT staff and office supplies), in the case that these costs are benefiting the agency as a whole and are not attributed to a particular program.
- **Section 5.2 Program Costs.** Equipment purchases now allowed up to \$5,000 per two year period.
- **Section 5.3.1 Facility Lease Payments.** Allowable costs in this category now include:
 - ✓ Hotel/Motel expenses for less than 90 days when no suitable shelter bed is available
 - ✓ Move-in costs (security deposits, first and last month's rent) for permanent housing
- **Section 5.4.1 Rent Payments** now includes:
 - ✓ Allows for rapid rehousing rental assistance beyond 24 months when there is written pre-authorization by funder of a rental assistance hardship request.
 - ✓ Other fees that are included in rent, including washer/dryer fees and landlord administrative fees.
- **Section 5.4.4 Ineligible Rent Expenses.** This line revised to read:
 1. First month or ongoing rent/utilities for subsidized housing.
- **Section 5.5.1 Flexible Funding** revised to include more allowable uses of these funds, and up to \$5,000 per household.
- **Section 5.5.2 HEN Essential Needs** has been deleted as Flexible Funding can now be used instead by the HEN program.

- **Section 6.2 Assessments and Housing Stability Planning** updated to say that these are not required for Targeted Prevention.
- **Sections 6.3, 6.3.1 and 6.3.2** have revised language re HMIS
- **New Section 6.6 PSH CHF Referral to Foundational Community Supports**
- **Section 6.7.6 Prohibitions** has this revised language:
 - ✓ Programs may not deny housing or housing related services based on the household's inability to pay fees for shelter.
 - ✓ If a program serves households with children, the age of a minor child cannot be used as a basis for denying any household's admission to the program.
- **Section 6.7.7. Nondiscrimination** has this new language:
 Programs 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.

Programs serving households with children must serve all family compositions. If a program operates gender-segregated facilities, the program must allow the use of facilities consistent with the client's gender expression or identity.

Local nondiscrimination laws may include additional protected classes.

- **Section 6.7.8 Training** has this new language:
 - ✓ Housing First
 - ✓ Racial Equity
 - ✓ LGBTQ+ competency
 - ✓ Rapid Rehousing
 - ✓ Progressive Engagement and Problem-Solving (Diversion)

Other recommended trainings include crisis intervention, professional boundaries, and case management.

- **Section 7.5 Landlord Documentation** has this new line:
 - ✓ Proof of ownership. (See Appendix F: Landlord Documentation)
- **Section 7.8.1 Rental Assistance Hardship Request** has this new line for when funder written pre-authorization is required
 - ✓ Client cannot take over full rent after 24 months of rental subsidy
- **New Section 8 Washington State Landlord Mitigation Law**
- **Appendix D: Income Inclusions and Exclusions** was deleted. Income inclusions and exclusions are listed in the Electronic Code of Federal Regulations, www.ecfr.gov, Title 24 – Housing and Urban Development: Subtitle A 0-99: Part 5: Subpart F: Section [5.609 Annual Income](#).
- **Appendix E: Rent Limits by Zip Code and Unit Size** has been updated:

2022 Rent Limits by Tier and Fund Source									
FUND	Basis	Tier	Studio	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
ESG	FMR * .8	1	1,270	1,321	1,552	2,123	2,494	2,869	3,299
CHG	FMR	1	1,588	1,651	1,940	2,654	3,118	3,586	4,124

ESG	FMR * .85	2	1,350	1,373	1,649	2,256	2,650	3,048	3,505
CHG	FMR	2	1,588	1,651	1,940	2,654	3,118	3,586	4,124
ESG	FMR * .95	3	1,509	1,568	1,843	2,521	2,962	3,407	3,918
CHG	FMR	3	1,588	1,651	1,940	2,654	3,118	3,586	4,124
ESG	FMR	4	1,588	1,651	1,940	2,654	3,118	3,586	4,124
CHG	FMR	4	1,588	1,651	1,940	2,654	3,118	3,586	4,124
ESG	FMR	5	1,588	1,651	1,940	2,654	3,118	3,586	4,124
CHG	FMR * 1.2	5	1,906	1,981	2,328	3,185	3,742	4,303	4,949

NOTES: ESG rent limits are based on relative rents per Dupree-Scott apartment vacancy report September 2017, up to a maximum of HUD Fair Market Rent for Seattle-Bellevue. Above rents include electricity and heat. Limits for 4,5 and 6 BR units are estimated 15% increase per BR.

1.2 Authorizing Statute

2 Administrative Requirements

2.1 Changes to Guidelines

2.2 Monitoring

2.3 Budget Revisions

2.4 Training

2.5 Ineligible Use of Funds

3 Allowable Interventions

3.1 Temporary Housing Interventions for Homeless Households

3.2 Permanent Housing Interventions for Homeless Households

3.3 Permanent Housing Intervention for Households at Imminent Risk of Homelessness

3.4 Services Only Interventions

4 Household Eligibility

4.1 Housing Status Eligibility

Question: Is the Housing Status based on where the household stayed last night?

Answer: Yes.

4.1.1 Homeless

4.1.2 At Imminent Risk of Homelessness

Question: Are households who are doubled up (staying with friends or family) considered homeless or at imminent risk of homelessness?

Answer: Households who are staying with family and friends are not considered homeless. They MAY BE considered at imminent risk of homelessness if they meet the following requirements:

- ✓ they will lose their primary nighttime residence within 14 days of the date of application for assistance
- ✓ AND no subsequent residence has been identified
- ✓ AND the household lacks the resources or support networks needed to obtain other permanent housing

Once the housing status is determined at imminent risk, grantees need to complete the Targeted Prevention Eligibility Screening Form if providing rent assistance.

4.2 Documentation of Housing Status

Question: How do we document homelessness in the client file for a client that is fleeing domestic violence?

Answer: For documentation, you would need a signed and dated self-certification (in the client's words) that provides enough details to confirm that they are fleeing domestic violence, they are afraid to return to their home, have no other residence and lack the resources or support networks to obtain permanent housing. We understand that this is a person in trauma, but some written statement is needed. Some details may be documented by case notes, or you may have to write it down and have them sign it.

Question: Are pay or vacate notices required for clients at risk of homelessness?

Answer: Pay or vacate notices are required for all CHG prevention rent assistance clients who are renting from a landlord. The Certification of Payment Obligation and Potential Eviction from Friend/Family form can be used for clients renting from a friend or family member.

4.3 Income Eligibility

This language in section 4.3 of the King County CHG Guidelines is revised to reflect the 2021 income limits:

HUD anticipates that the 2022 income limits will be published in April, 2022 at <https://www.huduser.gov/portal/datasets/il.html>.

2021 Income Limits for King County

Effective April 24, 2021

Household Size	1	2	3	4	5	6	7	8
Extremely Low (30%)	24,300	27,800	31,250	34,700	37,500	40,300	43,050	45,850

Question: Is income eligibility based on gross income or net income?

Answer: We use gross income for purposes of determining program eligibility. (Rapid Re-Housing programs note that net income is used for calculating rental subsidy amounts. This is reflected on the subsidy calculation form).

Question: Can income include an average of three month's income?

Answer: No. Income should be what the household is currently receiving. Income recently terminated should not be included. Documentation dated within 30 days is acceptable.

Question: Do you know when the income limits be updated?

Answer: The income limits are based on Area Median Income as published each year by HUD. We expect that HUD will publish the 2022 income limits sometime in April 2022. At that time we will notify you of the new income limits.

<https://www.huduser.gov/portal/datasets/il.html>

Question: The HMIS data standards require us to enter income information for clients at entry into our program. This includes sources and amounts and non-cash benefits received. How does this impact their eligibility determination for Rapid Re-Housing or Interim Housing when we are exempt from income eligibility requirements for the first 90 days of participation?

Answer: You should document and enter accurate information in HMIS at intake. In that case, the amount documented through this calculation should NOT be used to determine eligibility, but rather can be used to show that the household does lack resources to maintain housing.

4.4 Documentation of Income Eligibility

Question: Can BVS be used as documentation of SSI?

Answer: No. Refer to the allowable income documentation in Appendix C.

4.4.1 Documentation of HEN Referrals

4.4.2 Annualizing Wages and Periodic Payments

4.5 Income Eligibility Recertification

4.5.1 Income Ineligible at Recertification

Question: If a client is income ineligible and after three months no longer "remains in the program" but continues to have "case management" – can they still receive flexible funding expenses during that period of case management?

Answer: Yes, they are eligible for flex funds for as long as they are receiving case management services (up to six months past when the recertification finds them ineligible).

Question: I see from the CHG guidelines that clients must be under 30% AMI at income reassessment. Is this true for

all King County participants? I have significant concerns about the discrepancy between income which is <30% AMI, but still far away from being sufficient to afford market rate housing. Can you confirm that all KC RRH clients must be under 30% AMI when income certified?

Answer: RRH households are exempt from the income eligibility requirement for the first 90 days of program enrollment. Then income must be documented at least each 90 days. If households are determined income ineligible, (i.e. over 30% AMI) they may remain in the program (and receive financial assistance) for an additional three months. Case management may continue for an additional six months after the determination of income ineligibility to support the household transition to self-sufficiency.

Question: We are working with a family who is very close to hitting 30% of Area Median Income for gross income at her next reassessment. According to the CHG guidelines at that point she will be eligible for a max of 3 more months of rent, however in her case this conflicts with the KC-Seattle RRH guidelines because her net income is still within range to be eligible for subsidy (more than 60% of her net income is equal to rent/utilities). In cases like this are we able to make exceptions to the CHG guidelines?

Answer: No. This income eligibility threshold and timeframe is set by Commerce for our CHG funds. They do not allow exceptions for the CHG funds.

Question: Just so I understand clearly I'm going to share an example. A client enters our program on 1/10/19, has her first reassessment on 4/10/19 and is at 35% of AMI. She is still unhoused at that point so now in order to access county funds for move-in she needs to find housing before 7/10/19, after which point she would no longer be eligible for financial assistance, but could receive an additional 3 months of case management. Is that right?

Answer: Yes. If her income does not fall back below 30% AMI in that time, that is correct.

Question: If at re-assessment the client income is above 30% AMI, they are eligible for 3 more months of rent. What happens if during that time the income falls below 30% AMI again? Our client's income varies somewhat when her work schedule varies. Can we re-assess at that time and find them to be income eligible again?

Answer: Yes. Income eligibility recertification must happen at least every three months. Subgrantees can verify and document household income eligibility if income changes.

4.6 Additional Eligibility Requirements for Permanent Supportive Housing

4.6.1 Eligibility for Permanent Supportive Housing for Chronically Homeless Families (PSH CHF)

4.6.2 Documentation of a Disability

4.6.3 Documentation of Chronic Homelessness

4.6.4 Maintaining Homeless Status for Permanent Housing

Question: Is an individual or family that is receiving Rapid Re-Housing Assistance considered chronically homeless for purposes of remaining eligible for permanent housing placements dedicated to serving the chronically homeless?

Answer: Yes. Per HUD: If the client is considered chronically homeless prior to program entry in Rapid Re-Housing, they would maintain their chronically homeless status for the purpose of eligibility for other permanent housing programs dedicated to serving the chronically homeless, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs). Program participants maintain their chronically homeless status during the time period that they are receiving the rapid re-housing assistance. Rapid

re-housing is a model for helping homeless individuals and families obtain and maintain permanent housing, and it can be appropriate to use as a bridge to other permanent housing programs.

Note that, time in the RRH program does not count towards determining their chronic homelessness.

4.7 Definition of Households with Minor Children

Question: The definition of family in our contract exhibit seems to include either adults or children, rather than requiring children in some form. Please clarify whether that has changed.

Answer: If your contract exhibit specifies (at the top of the exhibit) that this is a program that exclusively serves households with minor children, this definition applies. Not all families have minor children.

5 Allowable Expenses

5.1 Administration

5.2 Program Costs

Question: Housing Advocacy Day is coming up in Olympia and we were hoping to send members of our staff. We feel that it is a vital part of our jobs to share the experiences of our clients and staff with elected officials while advocating for the important work we do. I wanted to confirm that we can pay for the registration and staff time out of our contracts as we view it as a training opportunity in addition to the other benefits.

Answer: No. We appreciate your advocacy. You would need to use other funds to pay for this. Funds in your County contracts cannot be used for political or lobbying activities.

Here is beginning of RCW 42.17A re lobbying: <https://app.leg.wa.gov/RCW/default.aspx?cite=42.17A.600>

Here is link to the Federal Hatch Act, 5 USC 1501-1508:

<http://uscode.house.gov/view.xhtml?edition=prelim&req=granuleid%3AUSC-prelim-title5-section1501&f=treesort&num=0>

Question: Are interpretation fees an allowable program cost expense? It is an essential service when working with non-English speaking clients which is a growing population of the clients we see.

Answer: Interpretation services are allowable as a program operations cost- communication is necessary for housing stability and housing search and placement activities.

Question: Can interpretation and background costs be covered if a client is not enrolled in Rapid Rehousing? For example, if the client decides not to enroll or we lose contact after the initial appointment when the background check and/or interpretation are provided?

Answer: These costs incurred during program participation are still covered even if the client declines services as some point. Please note that background checks at intake should not be used to disqualify a household from program services.

Question: Our agency pays for ORCA cards as an employee benefit. Is this an allowable program cost under this contract?

Answer: For guidance on this topic, refer to this website.

https://grants.nih.gov/grants/policy/nihgps/HTML5/section_7/7.9_allowability_of_costs_activities.htm

Which states:

“the costs of fringe benefits are allowable provided that the benefits are reasonable and are required by law, non-Federal entity-employee agreement, or an established policy of the non-Federal entity.”

So, if you have an employee agreement or established policy that ORCA cards are provided to your employees, than that is an allowable expense. The benefit must be reasonable and applicable to all employees.

5.3 Facility Costs

5.3.1 Lease Payments

5.3.2 Other Facility Costs

5.3.3 Ineligible Expenses

Question: The guidelines say that CHG rent assistance is not eligible in combination with CHG funded facility support. Can you clarify how this works in cases where a shelter or transitional facility wants to use some CHG funds to pay moving costs to permanent housing?

Answer: When a facility uses CHG to pay move in costs for a client, that represents a different time period. The client isn't receiving facility support and rent assistance at the same time.

5.3.4 HEN Facility Support

5.4 Rent

5.4.1 Rent Payments

Question: Can we pay for renters' insurance if it is required by the lease?

Answer: If payment for rent insurance is made to the landlord, then that would be considered part of the rent expense. If paid directly to the insurance company, you can pay for that with flexible funds.

Question: It recently came to my attention that shelter voucher programs are exempt from paying taxes on emergency motel stays for persons experiencing homelessness. We occasionally fund motel stays with our CHG dollars and I think we should qualify as a “shelter voucher program” in that context, however we wanted to check with you to be certain. I have tried connecting with a tax specialist at the department of revenue to clarify, but their response points me back to the relevant tax law. Please advise!

Answer: Thank you for bringing this to our attention. We have asked Commerce to connect with DOR and provide some guidance for us to clarify what qualifies as a “shelter voucher program” and explain how to go about asking for this exemption. **King County cannot give tax advice.** More information below:

Link to the state law: <https://app.leg.wa.gov/RCW/default.aspx?cite=82.08.0299>

Response to Commerce from Tax Specialist at Washington State Department of Revenue:

If the lodging is purchased through a shelter voucher program administered by cities, towns, counties or private organizations that provide emergency food and shelter services, the sale of the lodging for a period of less than thirty consecutive days is exempt from tax. To document the exemption, you need to keep documentation

showing that the lodging was purchased through the shelter voucher program.

For more information please review [Available retail sales tax exemptions, deductions, and credits.](#)

Question: Can rent assistance be paid for household to move outside of King County?

Answer: CHG and ESG can be used to pay for moving costs and first month's rent. You would still need to meet the requirements for inspection and documenting whether it is private rental housing. If your contract includes federal CoC funds, those funds can only be used for housing within King County.

Question: In the case when we are moving the household outside of King County, can we make exceptions to pay for additional months' rent assistance?

Answer: Exceptions may be made on a case by case basis when circumstances require a move outside of King County. Documentation in the client file must include:

- A description of the circumstances necessitating a move outside of King County;
- A plan for the family to pay their full rent amount within three months of subsidy;
- This plan includes regular communication with the housing advocate to check in with the household. You are required to meet with the client at least monthly during the rental subsidy period.
- Supervisor signature approving the exception
-

Question: We have a client in a DV situation without shelter and she has requested a hotel outside of the County for safety reasons. Would that be ok?

Answer: Exceptions may be made on a case by case basis when circumstances require a move outside of King County. You would need to ask approval from your contract manager ahead of time.

Question: Since rent is due on the first of the month, does the county pay a month in advance, or is the service provider reimbursed after paying the rent?

Answer: We reimburse sub grantees after you have paid the rent. Since rent is generally due by the first of the month – we understand that often means that, for example, January rent may be paid in December. So, we can reimburse for that January rent on your December invoice to us if that is when you paid the rent.

On your tenant list, it is preferable to itemize the monthly rent in the column by which it was paid (so in the previous example you would reflect the January rent in the December column). Doing that makes it possible for the formulas on the tenant list to work effectively. It would be helpful to include a note in the "notes" column on the tenant list to explain this.

Question: CHG can be used to pay rental arrears for up to six months. Does this include paying past rental debt owed to a previous landlord? Do you have any tips on negotiating this amount down?

Answer: Neighborhood House has a financial empowerment program that can help clients with debt reduction planning. We need to make every effort to negotiate the amount of rental debt down, especially in regard to added fees and interest. This program can help with that.

<http://www.nhwa.org/financialemPOWERment/>

Question: Is it allowable to pay rent arrears for a HEN (or TANF) client from a period of time when they were not HEN eligible (or on TANF)?

Answer: Yes. The expense is counted based on their current eligibility at the time this expense is paid. This is a

payment to help that HEN (or TANF) household become permanently housed now.

Question: What are landlord incentives?

Answer: Landlord incentives may include things such as an increased deposit for a high barrier client; costs associated with terminating a lease when that is appropriate, especially when that can help a household to keep an eviction off their record; reimbursing a landlord for damages to a unit so that the relationship with that landlord can be maintained. All payments for landlord incentives should be well documented in the client file. Also, please note that you are expected to have a policy around landlord incentive expenses, and to follow those policies, if you wish to charge against this category of costs. If you would like to see an example of a landlord incentives policy, contact your CHG contract manager.

Question: I want to check in with you about a request I've received from a landlord about damage/loss mitigation. The landlord is requesting some compensation for 2 tenants that were in our program when they started renting from this landlord. Those tenants have been exited from our program for 2 and 3 years. They left owing rent and caused some damage. What is your view on the timeline? What do you think is a reasonable window of time from the point the household exits the program to allow damage mitigation claims to be requested and granted?

Answer: Two years is a reasonable time frame if it helps to maintain a relationship with that landlord. We want to preserve our landlord relationships and the goodwill in the community. We would expect there to be documentation of the damage. And, we would expect this to be addressed in your landlord incentives policy.

Question: A client has found an RV that he can buy. It is in reasonable condition. He has made arrangements to keep it at a place where he will have running water and electricity. Can CHG pay for purchase or repairs to this RV, and what would be the requirements around inspecting an RV?

Answer: CHG could not pay for purchase or repairs of a vehicle or RV. It could pay for lot rent, though the inspection requirement would still apply:

- ✓ Lot rent for RV or manufactured home (structure must meet rent assistance guidelines including necessary housing certification/inspection and lead-based paint assessment).

Question: We have a RRH client that obtained housing and then went on a downward spiral and got evicted after resisting our efforts to negotiate a mutual termination of the lease etc. She is now out of the unit. She damaged the unit, left some belongings there etc. The landlord is requesting some financial assistance from us to mitigate his damages. Can we use CHG to pay for this and if so, what kind of documentation is needed?

Answer: Yes- that's considered landlord incentives- a rent assistance allowable cost.

- ✓ Landlord incentives, including reimbursements for damages paid to a landlord. (provided there are written policies and/or procedures explaining what constitutes landlord incentives, how they are determined, and who has approval and review responsibilities).

Question: Our client and their friend will be rooming with one another and both names will be on the lease. Our program would be providing a rental subsidy for the client's portion of the rent. Is this acceptable within the requirements of our rapid rehousing contract with you?

Answer: This is not a problem. You are only subsidizing the client's share of the rent.

Question: Are we required to obtain a W-9 and submit 1099s for rent assistance paid to friends or family members?

Answer: The following information is from a Housing Authority (via Commerce) regarding W9s from landlords versus private individuals not in the business of being landlords:

Entities that are in a trade or business (including non-profit organizations) are required to obtain a W-9 from and submit 1099s to anyone paid over \$600 for rents paid or services rendered (among other situations). If no W-9 is obtained from the person receiving the payments, then the paying trade or business entity is required to

withhold 28% for backup withholding. Since this imposes a significant amount of reporting and tracking burden on us at the HA, we restrict our landlord payments to only persons in the trade of rental real-state and who have furnished a legitimate W-9.

Please note King County does not interpret IRS guidance. This information is being provided to you for your own determination.

5.4.2 Other Housing Costs

Question: With the recent update that client phone bills are now an allowable utility expense, some staff have questioned whether the cost of purchasing a new phone (if included in the utility bill) is allowable under CHG funds?

Answer: Purchasing a phone would typically fall under flexible funds. If the cost of the phone is included in the monthly utility bill – you can count that as a utility expense. However, the cost of the phone would count towards the maximum allowable flexible funds expense for that household. So, you would want to document that in your client file.

Question: We have a client that found an apartment that will lease to her if the following debts are covered: Comcast, Sprint, and Centurylink. Can we pay those as utility arrears?

Answer: Yes. Payment of those arrears is allowable if the payment enables the household to obtain or maintain permanent housing. Note that payments for ongoing cable or satellite TV are not eligible as a housing cost.

Question: We have a RRH client that is applying for Permanent Supportive Housing. Are we allowed to pay the application fees for PSH?

Answer: Yes.

5.4.3 Special Circumstances

Question: We have a referral for a client that is going into Section 8 housing. If that is the case, can we assist her with move in costs?

Answer: Yes. Rent assistance may be used for move-in costs including but not limited to deposits and last months' rent. Rent assistance funds cannot be used for first month's rent or ongoing rent/utilities. Funds cannot be used for the same type of assistance that is subsidized through other public funds (either full or partial subsidy).

Question: CHG Guidelines for Allowable Rent Assistance Costs includes this language:

- ✓ Subsidized Housing: CHG rent/utility assistance may be used for move-in costs (security deposits, first and last month's rent) for subsidized housing (where household's rent is adjusted based on income), including project- or tenant-based housing.¹ CHG may also be used for rental arrears or utility arrears for subsidized housing.

We assume this language only pertains to operating subsidies. How does this apply in the case of public capital development subsidy? Please confirm that ongoing CHG rent/utility assistance may be used for households in buildings with local public capital development subsidy, either tax credit or non-tax credit.

Answer: Yes. This is correct.

5.4.4 Ineligible Expenses

Question: I understand that we cannot pay for rent that is already subsidized by another entity (i.e. clients with Section 8 at move-in). I'm wondering if at move-in (only) if we are allowed to at least pay the client's portion of their rent? Many of our clients do not have very much to any income left by the time they move-in so this is a barrier.

¹ In this context tax credit units are not considered subsidized housing.

Answer: No. Funds in your county contract may not be used to pay any portion of first month's rent or ongoing rent when moving into subsidized housing. It can only pay for security deposits, last month's rent deposit or fees.

Question: Can you give an example of what is meant by this statement in the CHG Guidelines?

"Financial assistance to a program participant who is receiving the same type of assistance through other public sources (either full or partial subsidy)."

Answer: For example, if a household is receiving rental arrears assistance from another public source (either full or partial subsidy), CHG funds must not be used to pay the remaining portion of the rental arrears for that program participant. Please note that the "same type of assistance" refers to each of the various types of rent assistance costs listed under sections 5.3.1 and 5.3.2. An eligible household could receive CHG assistance for a security deposit at the same time they are receiving assistance for a utility payment from another public funding source. Other Direct Client Assistance

5.5 Other Direct Client Assistance

5.5.1 Flexible Funding

Question: How can providers pay for items such as food, diapers or work shoes if we can find an eligible voucher or gift card?

Answer: Examples include program staff accompanying households to purchase goods, ordering goods online, developing reimbursement procedures with local vendors and a 'flexible funding' supply closet for frequently requested items.

Question: Can pet deposits be paid with flexible funding?

Answer: Yes, if it will directly help a homeless household to obtain or maintain permanent housing..

Question: Can I use flexible funding to pay utilities?

Answer: No. Utilities are a rent assistance expense, in the category of "other housing costs".

Question: Can I use flexible funding to pay storage fees (to preserve homeless household possessions while searching for housing) and driver license reinstatement fees (to support employment/increasing income)?

Answer: Yes.

Question: Are we permitted to pay renter's insurance at move-in and in subsequent months after move-in if clients do not have funds and it's stipulated in their lease that they stay current on renter's insurance?

Answer: Yes. If this fee is for a specific client and allows them to have furniture needed for housing.

Question: Can I use flexible funding to cover the NW Furniture Banks \$75 processing fee. I know we can cover their delivery fee.

Answer: Yes.

Question: Does a household need to be enrolled in a rapid re-housing program in order to receive flexible funding?

Answer: Any type of intervention can use flexible funding for homeless households. Flexible funding can be used to divert eligible homeless household from needing additional interventions, or could be administered in conjunction with other interventions. It also can be used on its own, independent of a housing intervention.

Question: How is flexible funding different from what a household would receive in a rent assistance program?

Answer: Flexible Funding is the provision of goods or payments of expenses that directly help a homeless household to obtain or maintain permanent housing. Homeless households are eligible for flexible funding up to \$5,000 per household. Flexible funding can pay nontraditional expenses that help a homeless household obtain or maintain

housing. For example, James was recently housed with the assistance of your rapid re-housing program. Yesterday he was hired at a local restaurant. He needs to buy his uniform in order to start the job. Flexible funding can pay for that expense because increasing income will help James maintain his housing. This was not previously allowable.

Question: Where do I bill flexible funding expenses?

Answer: For rent assistance programs, please include flexible fund payments in your rent assistance budget and itemize on the tenant list that you submit with your invoice. For other types of programs you can charge it under program costs. In any event, the payments should be included on the general ledger detail submitted with your invoice. Be sure to have documentation in the client file.

Question: Are moving costs, such as a moving truck, still allowable expenses?

Answer: Yes, this is allowable under Flexible Funding if it will directly help a homeless household to obtain or maintain permanent housing. Reasonable moving costs, such as truck rental were previously allowable under “Other Costs Associated with Rent.”

Question: In the CHG guidelines it states that legal fees and fines specifically related to obtaining housing are allowable. What sort of fees does this include?

Answer: Typically, this would include fees related to housing debt owed to a previous landlord. Please refer to answers in 7.10.1 above about negotiating those amounts down, and financial empowerment services.

Also, please note that, because we need to separate out costs paid to private landlords (including rent arrears) we need to, on the tenant list with your invoice, split out the “rent” portion of the arrears from the “interest and fees, etc.” portion of the rent arrears. Those separate amounts would go on separate lines on the tenant list so they can be charged to different categories on King County’s invoice to Commerce. We understand that getting this detail may sometimes be challenging when dealing with a collection agency. We recommend asking for help with the Financial Empowerment Center. And, do the best you can with documenting whether this previous landlord is a “private landlord”.

Question: Can pet deposits be paid with flexible funding?

Answer: Yes, if this will directly help a homeless household to obtain or maintain permanent housing and is noted in the household’s housing stability plan.

5.5.1.1 Ineligible Expenses

6 Requirements of all Subgrantees

6.1 Progressive Engagement

Question: Does making supportive services voluntary mean that clients can choose not to participate in case management?

Answer: CHG sub-grantees may require participation with housing stability planning, but should not require participation in specific supportive services. It is best practice to offer flexible services that build on the individual strengths and resources of each household, respecting their autonomy.

(Supportive service examples include substance abuse treatment, financial planning classes, and resume workshops.)

6.2 Assessment and Housing Stability Planning

6.2.1 Housing Focused Case Management

6.2.2 Housing Stability Plan

6.2.3 Re-Assessment

Question: I am confused about if and when we are required to use the new Income Eligibility Form. From the guidelines it looks like this is required at move-in and every 90 days for rapid re-housing programs, but in other areas program entry is referenced so I just want to confirm that. Furthermore, if it is only required at move-in and every 3 months, I'm confused about why this would be required in addition to the Subsidy Calculation spreadsheet since that verifies the same thing? Please confirm!

Answer: The rental subsidy calculation form is required at move-in, and any time the income or rent changes.

The income eligibility form is not required at program entry or at move-in. It is required every 90 days after program entry to document household income. Along with that form should be backup documentation for the income. And, that would also be a good time to do the 90 day RRH re-assessment form. If the income and rent amounts haven't changed, there wouldn't be any change to the subsidy calculation form.

Question: We hold re-assessment meetings every 3 months after program entry until the client is housed, then the "reassessment clock" resets at move-in and we would schedule the next one 3 months from the move-in date (rather than continue on the same every 3 months from intake). Does this schedule work?

Answer: Yes. It is a good idea to reset the re-assessment clock at move-in as no more than 3 months elapses between documenting income.

6.3 HMIS

6.4 Ensure Habitability

6.4.1 Ensure Habitability

Question: For trailer or RV rent subsidy, is an inspection or certification required?

Answer: Habitability requirements apply to trailers and RVs

Question: When paying for motel stays, does the motel need to be inspected?

Answer: No

Question: I want to check in with you about a housing opportunity that has come up for a client. The household consists of 3 adults and a 3 year old child. They have a lot of barriers to housing including evictions, debt, and criminal background. They have found someone willing to rent a room to them with access to shared laundry,

bathroom, and kitchen. The only difference in this situation from a boarding house is that the room is in a separate building from the shared spaced, but on the same property. Is that a problem?

Answer: As long as the space would pass an inspection. The bathroom and kitchen space do not have to be in the same building, it just needs to be adequate, and they have reasonable access to it. The food preparation area must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner. The residents must have access to sufficient sanitary facilities that are in proper operating condition, are private and are adequate for personal cleanliness and the disposal of human waste.

In addition, you should confirm that the situation is reasonable in light of any mobility issues, disabilities or young children in the family. How far away is the bathroom? Is it reasonable for family members to walk to the bathroom alone in the middle of the night in their pajamas? Does it feel safe overall? Is there some sort of security around the perimeter? Is it a covered walkway, or out in the rain and snow?

6.4.2 Allowable Methods for Unit Habitability Determination

Question: We are working with a client who is homeless in King County but has a support network in Spokane and a possible housing opportunity there. We have not assisted with an out of the region move since I've been in this role, so I just want to be sure that we comply with the guidelines properly. I understand that in these rare cases we can ask landlords to complete the "Landlord Habitability Standards Certification Form" in lieu of an inspection. Does completion of this form also satisfy the lead-based paint visual inspection requirement? Or are we only permitted to avoid LBP assessments in cases where there are no children under age 6 in the home?

Answer: That's a good question. The Lead Based Paint is a federal requirement. They don't have an alternative to a visual inspection. A visual inspection is required if there are children under 6 – and the property is older than 1978. You could determine the age of the building by looking at the county parcel viewer. (print that out for the client file). If it is a newer building you can avoid the LBP assessment.

Question: What does it mean in the guidelines when it says "if no federal funds in subgrantee contract"?

Answer: The Landlord Habitability Standards Certification Form in lieu of (as an alternative to) an HSS or HQS inspection is not allowable for federally funded rental assistance. Subgrantees that have CoC, ESG or CDBG funds in their contract with King County may not use this form in client files. Federal funding also requires HSS inspection for households moving in with friends or family.

Question: We lease units from the local housing authority. They must follow HUD requirements on housing inspections. Must we perform our own unit inspections as well?

Answer: You should get written confirmation from your landlord that they comply with the CHG requirements for unit habitability for facilities. Confirm with them that the documentation of those housing inspections would be accessible for review if needed.

Question: What is the inspection requirement for a drop in shelter with mats on the floor or in a church basement?

Answer: Facilities, including congregate facilities, must conduct and document an inspection at least once a year using the HHS form or HQS form.

6.4.3 Habitability Complaint Procedure

Question: The guidelines state that our policy must include a mandatory inspection when a complaint is reported. Is this a mandatory inspection any time a client reports a repair concern to us? Or just when clients file a formal complaint with us? Or just referring to issues that should have been caught in an inspection but were missed?

Answer: You need to inform clients in writing of your habitability complaint process. And, you need a written procedure describing how you respond to complaints, including a mandatory inspection, follow-up and resolution. If a client

reports a repair concern, it is up to the client if they want to file a formal complaint with you. If it is a minor concern, and the landlord is addressing it – then they may choose not to trigger the complaint process.

6.5 Lead Based Paint Assessment

Question: Our case manager did the inspection and unfortunately the unit failed the lead-based paint visual assessment. The landlord contacted us and told us that they made repairs and that there is no longer any visible lead-based paint. Usually when we fail a unit for lead-based paint we simply tell the client and landlord that we cannot move forward with the property because of this as landlords are often unwilling to fully repaint the building. I know lead removal is more complicated than simply repainting as well so I wanted to write you both to learn what specific documentation we would need (aside from a second inspection) to confirm that the unit can pass the lead-test. Please advise, thank you!?

Answer: I think this link at the Commerce website is helpful: <https://www.commerce.wa.gov/building-infrastructure/housing/lead-based-paint/renovation-repair-painting/>. Repairs must be done by contractor that is certified for lead paint repairs. Repairs must be done in a lead-safe fashion, following lead-safe work practices. If they were not, then there is still a risk of lead dust in the unit after the repairs.

6.6 PSH CHF Referral to Foundational Community Supports

6.7 Additional Requirements

6.7.1 Client File Checklist

6.7.2 Informed Consent to Review Information in the Benefits Verification System

6.7.3 Personal Identifying Information

Question: The guidelines state that “Personal identifying information must never be sent electronically unless sent via a secure file transfer.” Internally we always avoid sending PII over email as much as we can and lean on HMIS ID’s, initials, and first names only, depending on the situation. Unfortunately this is much more difficult when communicating with persons outside of our HMIS system such as landlords, debt collectors, furniture bank, employment programs/etc. With clients permission is it still acceptable for us to email their full names in these situations? Unfortunately I don’t think landlords or debt collectors would be apt to work with secure file transfers / encrypted emails?

Answer: Good question. It is allowable when that information is necessary to facilitate service coordination or housing for the household. In that case, you would need to have a signed “Release of Information” on file for that specific purpose.

6.7.4 Required Policies and Procedures

6.7.5 Records Maintenance and Destruction

6.7.6 Prohibitions

Question: When does the following prohibition apply?

“Subgrantees may not deny housing or housing related services based on the household’s inability to pay.”

Answer: The prohibition applies to all housing programs.

6.7.7 Nondiscrimination

6.7.8 Training

7 Additional Requirements for Rapid Re-Housing and Targeted Prevention

7.1 Seattle-King County Rapid Re-Housing Program Model

7.2 Interested Landlord List

7.3 Outreach to Landlords

7.4 Washington Residential Landlord-Tenant Act

7.5 Landlord Documentation

7.5.1 Rental Subsidy Agreement

7.5.2 Lease

Question: We wanted to get some guidance about moving a client in with friends or family who are renters without them being on the lease. We acknowledge that this is a precarious position for clients to be placed in and have reservations about using funds in this manner. We do know, however, that some programs have viewed this an extension of client choice and have not elected to interfere with this housing plan. Can we use move-in/rental assistance for a client who is not listed on an official lease and we cannot confirm that the landlord approves of their being there?

Answer: Per the guidelines, there must be a lease or rental agreement between the household and the landlord. So, yes, there must be some documentation that the landlord consents to their being there. Is there any language in the renter’s lease about what whether they can have roommates, or sub-lease? Also, rental assistance must be paid directly to the landlord, not to the roommate.

7.5.3 Certification of Payment Obligation

Question: What does it mean in the guidelines when it says “if no federal funds in subgrantee contract”?

Answer: The Certification of Payment Obligation in lieu of a lease is not allowable for federally funded rental assistance. Subgrantees that have CoC, ESG or CDBG funds in their contract with King County may not use this form in client files.

7.6 Targeted Prevention

Question: If a household with a HEN referral does not score high enough on the targeted prevention form, can we serve them?

Answer: You cannot assist a HEN referral with HEN or CHG rent assistance if they do not score high enough on the targeted prevention form. However, the form has an Override Approval section that a supervisor may sign with added justification. All HEN referred clients (regardless of housing status) are eligible for Essential Needs assistance.

7.7 Rent Limits by Zip Code and Unit Size

Question: Is there a bedroom maximum occupancy standard for these funds? Can we limit occupancy to two persons per bedroom?

Answer: The rent limits are focused on not paying too much for a unit of a certain size, and to prevent over-housing, for example to not have one person in a 2 bedroom.

Maximum occupancy for a unit is determined by local ordinances, which you would be expected to know and follow. When a housing provider limits the number of occupants in a unit, it impacts families with children more severely than families without children. To comply with fair housing, a variety of factors would need to be considered. More information is at this website:

<https://www.kingcounty.gov/~media/exec/civilrights/documents/occupancy.ashx?la=en>

Question: How often will the rent limits be updated?

Answer: The rent limits are based on Fair Market Rents for Seattle-Bellevue as published annually by HUD. These guidelines reflect the 2022 HUD FMR that was published in October 2021. We anticipate new HUD FMRs each year around October. At that time we will notify you of any changes to the rent limits.

Question: Are Rent Limits required for households staying with friends or family members?

Answer: Yes.

Question: How do you calculate the rent limit if the household is sharing housing with friends or family members?

Answer: If the client is sharing housing, you would calculate based on their percentage share of that unit. For example, if your client has an agreement to rent 50% of a two bedroom unit, then the rent limit would be 50% of the limit for a two bedroom unit in that neighborhood or city. The percentage share of the unit must be based on how many individuals will share the housing. For example, if your client is a household of two people sharing housing with three other people, then the percentage share of the housing would be 2/5 or 40%.

Question: When a client is entering a rapid re-housing program we don't need to check their income for 90 days. Does this mean they do not have to pay a portion of their rent?

Answer: Homeless households entering a rapid re-housing program are exempt from income eligibility requirements for the first 90 days of program participation. This exemption is regarding CHG income eligibility. This is not connected to how a program determines the rent subsidy amount or the household's share of rent.

Question: It says that "Exceptions to the rent limits can be made on a case by case basis ..." Does that mean the sub grantee can make the exception, or does King County have to approve the exception?

Answer: Sub grantees may make exceptions to the rent limits. You do not have to ask for approval. King County would expect those exceptions to be rare, and for there to be documentation in the client file as stated in the guidelines.

Question: Are the rent limits on the chart the maximum amount of subsidy we can pay?

Answer: The dollar amounts represent the limits for the total rent cost of the unit. We cannot assist a household to rent a unit that costs more than the total rent listed.

7.8 Determining Rent Subsidy

Question: Is rent subsidy based on net income or gross income?

Answer: Income eligibility is based on gross income. The rent subsidy calculation is based on net income. The rental subsidy calculation form has been updated to reflect net income. It still refers to gross income in the Seattle-King County Rapid Re-Housing Guidelines document. That requirement was changed since those guidelines were printed.

Question: When a client is entering a rapid re-housing program we don't need to check their income for 90 days. Does this mean they do not have to pay a portion of their rent?

Answer: Homeless households entering a rapid re-housing program are exempt from income eligibility requirements for the first 90 days of program participation. This exemption is regarding income eligibility. This is not connected to how a program determines the rent subsidy amount or the household's share of rent.

Question: We were excited to see that cell phone and internet are now allowable utility costs and are trying to understand how this fits in with the "utility subsidy" that is calculated on the Subsidy Calculation Worksheet. Since that worksheet just covers electric, heat, and water/sewer/gas, I am assuming that we are permitted to fund phone/internet outside of the "utility subsidy" specifications on that form. Is that right?

Answer: Phone / Internet expenses do not factor into the rent subsidy calculation, nor is it considered flexible funding. It is an allowable utility expense that can be included in your "Rent Assistance Costs" portion of your budget. Please include phone payments on the tenant list that you submit with your invoice, and indicate it as a utility payment.

Question: If a client has monthly fees that are spelled out in the lease, like for a washer and dryer, can we consider that part of the rent? It's not optional in the lease agreement, but is still an ongoing housing cost. Also, if the lease requires renters' insurance, is that considered 'rent' and can we cover it? Again, it is not optional but a requirement of the lease?

Answer: Yes. If it is required in the lease

Question: At the bottom of the rent subsidy calculation form it says "CoC funds cannot pay utilities. If tenant portion is less than utility amount, use other than CoC funds for this amount". Are RRH programs required to make utility payments for clients? Or, does this mean that we can only pay utilities for households that are not on CoC subsidy?

Answer: The expectation, as shown on the subsidy calculation form, is that we are paying a subsidy on rent and utilities for everyone, if at all possible based on available funding. The only relevant CHG requirement about paying costs for a CoC client is that it cannot pay a portion of a cost if there is another fund paying for some of that same cost. That is an issue with paying rent arrears. You cannot split up the payment of a rent arrear bill among multiple fund sources. In the case of utilities – if CoC is not paying for any utilities that month, you can use CHG funds to pay for the utilities for that household. You cannot count the CHG payment against your CoC match, as it was not an eligible cost.

7.8.1 Rental Assistance Hardship Request

Question: Would we be able to request a hardship exception for clients who are above the 60% rent to income ratio, but also above the 30% AMI limit?

Answer: It is not a hardship exception if the household is within this window of eligibility and still qualifies for subsidy based on their rent to income ratio. You don't need to factor in the 30% AMI in calculating the subsidy amount.

8 Washington State's Landlord Mitigation Law

9 Appendices

9.1 Appendix A: Client File Checklist and Required Documentation

Question: As we are trying to move to less paper in our files, a question arose about our intake applications. Currently there is a lengthy form for the Head of Household, a slightly shorter one for other adults and just one page per minor child in a household. These are where we get all of our demographic data, homelessness information etc. After this information is input to HMIS and our in-house database, do you need for the actual papers to stay in the client file or can we shred them??

Answer: As long as all of the documents and case notes, etc... are available to the County or other auditors upon request for monitoring and review, for example, they can be digital.

Question: In a prevention program, if someone is only receiving TANF income and is at risk of homelessness, do we need to document their housing status – At Risk of Homelessness?

Answer: All households, regardless of income source, who are at imminent risk of homelessness, must have their housing status documented.

9.2 Appendix B: Housing Status Documentation Requirements

Question: I'm unclear if 8.2 appendix B is a form that must be filled out and kept in each client file, or if it just a reference document noting the type of back-up documentation that must be in each file to verify this status?

Answer: King County is no longer requiring a specific form for this. Appendix B is a reference document. You just need to have the backup documentation as described. Refer to the checklist in Appendix A.

Question: Are pay or vacate notices required for clients at risk of homelessness?

Answer: Pay or vacate notices are required for all CHG prevention rent assistance clients who are renting from a landlord. The Certification of Payment Obligation and Potential Eviction from Friend/Family form can be used for clients renting from a friend or family member.

9.3 Appendix C: Income Eligibility Documentation Requirements

Question: Are we to document net income or gross income on the Income Eligibility Form?

Answer: Income eligibility is based on gross income. The rent subsidy calculation is based on net income.

Question: I am confused about if and when we are required to use the new Income Eligibility Form. From the guidelines it looks like this is required at move-in and every 90 days for rapid re-housing programs, but in other areas program entry is referenced so I just want to confirm that. Furthermore, if it is only required at move-in and every 3 months, I'm confused about why this would be required in addition to the Subsidy Calculation spreadsheet since that verifies the same thing? Please confirm!

Answer: The rental subsidy calculation form is required at move-in, and any time the income or rent changes.

The income eligibility form is not required at program entry or at move-in. It is required every 90 days after program entry to document household income. Along with that form should be backup documentation for the income. And, that would also be a good time to do the 90 day RRH re-assessment form. It would be a good idea to align the income eligibility timeline (each 90 days from program entry) with the 90 day re-assessment (each 90 days from move-in). If the income and rent amounts haven't changed, there wouldn't be any change to the subsidy calculation form.

Question: Do we have to use the CHG Income Verification form, or can we use our own form that includes making sure the income is within the 30% AMI HUD limit?

Answer: Does your form have all the same elements? Send a copy of your form and we can make a determination.

Question: Many of our case managers are not doing intakes at a computer, so they may not be able to complete this form at the appointment and have the client sign. Is it ok for folks to complete this form with paper and pen, not electronically, and do their own math rather than the automatic Excel formulas?

Answer: It's fine if you want to print out the CHG form and do the math by hand. Be sure that your print out includes the signature section at the bottom. The print area was corrected with the updates of April, 2019.

Question: Regarding Appendix C, does this list need to be in each client file? There doesn't seem to be anything for us to fill out here, like check-boxes or anything, but the wording on the top of the page makes it sound like it should be in each file? Or is that wording at the top referencing the Excel Income Eligibility Form?

Answer: Appendix C is not a form. It is a list of what should be in the file depending on the type of income. The backup documentation plus the income eligibility verification form is all that is required to be in the client file.

9.4 Appendix D: Lead Based Paint Visual Assessment Requirements

9.5 Appendix E: Rent Limits by Zip Code and Unit Size

9.6 Appendix F: Landlord Documentation Requirements

Question: With the change to the definition of "private landlord" to include all but government or tribal-owned housing, this means the "non-profit" category has essentially been eliminated, is that correct? Also, I don't think we ever had the category of "tribal owned" or does that count as "government owned"? I don't think we've ever had someone in tribal housing, but just want to know how to handle it if we do in the future?

Answer: Correct, the "non-profit" category is eliminated. You no longer need to do an IRS search. Any individual, business or non-profit owner is now considered "private". The guidelines consider a Housing Authority to be "private" as well. "Government" includes "Tribal Government". In any case, we would still like to see a lease and parcel viewer search in the client file.

Question: We used some CHG funds to pay an application fee. They went on to move into housing and no CHG funds were used for move-in or rent assistance. Do we still need to document the landlord in the file?

Answer: No.

Question: How do we document landlords when paying rent arrears?

Answer: For rent arrears, the tenant list and documentation should reflect the property owner of the unit for which arrears are being paid. Documenting the owner for a previous unit may sometimes be challenging. You should try to find some documentation of the address for that prior unit. If it is in King County, you could then document as you would any King County address. If you are not able to document the address of the prior unit, you should list those arrears in the tenant list as landlord type "unknown". If you are not able to document the property owner for rent arrears, there should be notes in the client file describing why it was not possible to document the landlord.

Question: How do we document landlords for units that are outside of King County?

Answer: Search on the Internet for parcel viewer in that County. If you are unable to locate parcel records for that county, you would need to ask the landlord to sign a "Property Owner Certification Form". Ask your CHG contract manager for a copy of that form.

9.7 Appendix G: Access to the DSHS Benefits Verification System Data Security Requirements

9.8 Appendix H: Access to the DSHS HEN Referral List Data Security Requirements

9.9 Appendix I: Overview of HEN Eligibility at Enrollment and Recertification

9.10 Appendix J: Disability and/or Length of Time Homeless Documentation Requirements