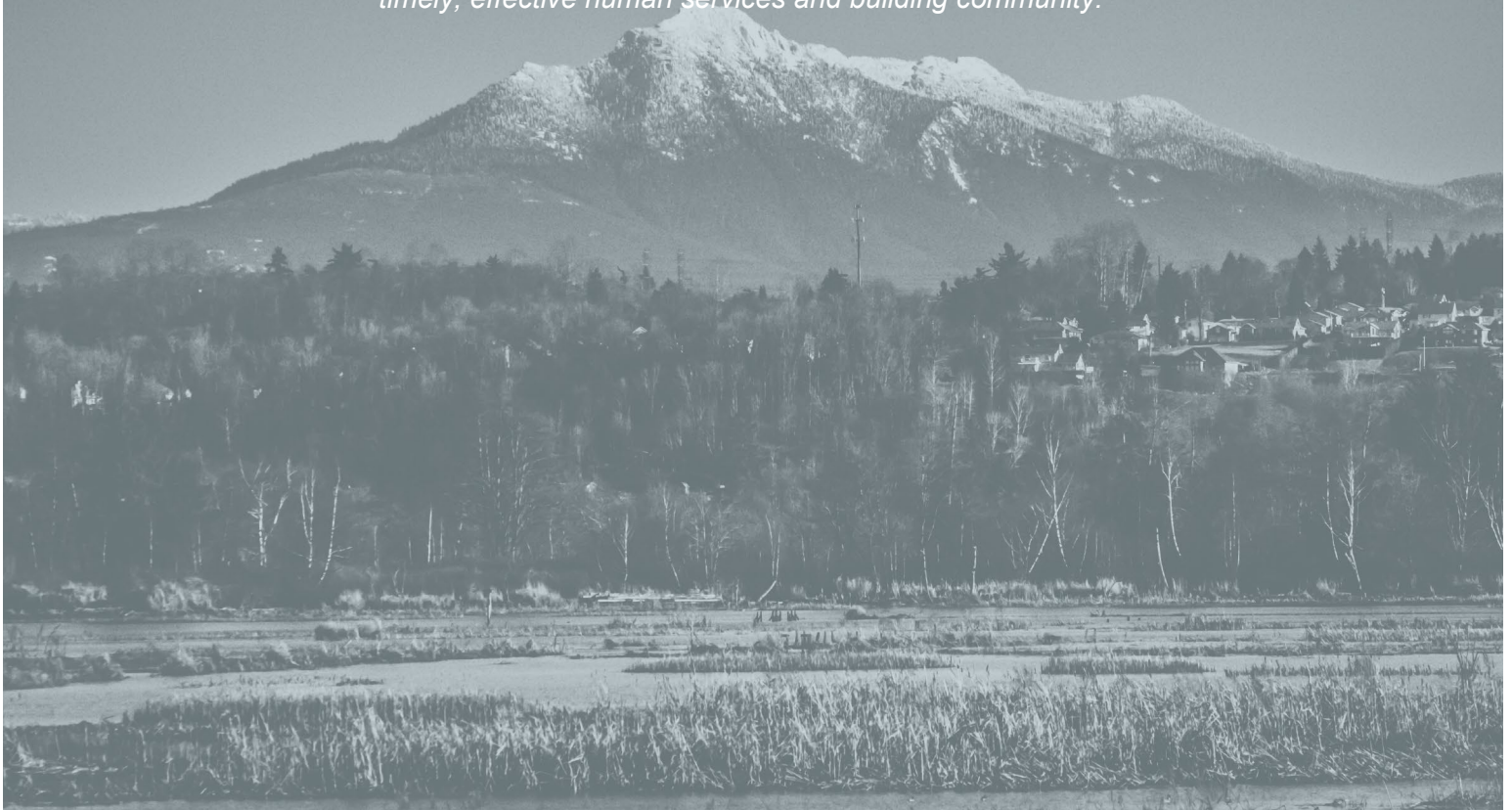




Snohomish County **Human Services**

2025 – 2029 CONSOLIDATED PLAN & 2025 ANNUAL ACTION PLAN

*The mission of Human Services is to help all persons meet
their basic needs and develop their potential by providing
timely, effective human services and building community.*



Snohomish County

Urban County Consortium

2025-2029 Consolidated Plan &
2025 Annual Action Plan

May 21, 2025

**Snohomish County Urban County Consortium
2025-2029 Consolidated Plan and 2025 Annual Action Plan
Lead Grantee Template**

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I. Executive Summary

ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

1. Introduction

Snohomish County, the City of Everett, and the City of Marysville have prepared a joint 2025-2029 Consolidated Plan and 2025 Annual Action Plan. These plans are required by the U.S. Department of Housing and Urban Development (HUD) in order to receive federal grant funds available under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The plans serve both as local planning documents and applications to HUD for these funds.

The Snohomish County Urban County Consortium (the Consortium) is a partnership between Snohomish County and the cities and towns within the county. The partnership allows the Consortium, as an Urban County, to receive funds each year under the CDBG, HOME, and ESG programs as formula grants and to use these funds to address local needs and goals. Snohomish County is the lead agency for the Consortium and the grant recipient of CDBG, HOME, and ESG funds on behalf of the Consortium. In this capacity, Snohomish County is responsible for the overall administration, planning, monitoring, and reporting requirements for these programs, including citizen participation and private and public agency consultation. The City of Everett and the City of Marysville participate in the Consortium for HOME funds only and are each also direct grant recipients of CDBG funds that benefit their respective jurisdictions and are the lead agencies for these CDBG funds. The plans were prepared in collaboration with residents, public agencies, private non-profit organizations, faith-based organizations, local governments, and other stakeholders through consultations, surveys, and a citizen participation process consistent with our Citizen Participation Plan (CPP). The plans were also informed by quantitative and qualitative data, existing plans and reports, and general research.

This document is the Snohomish County Consortium - Lead Grantee Template. This Executive Summary serves as the Executive Summary for the Lead Grantee Template. The City of Everett and Marysville Participating Grantee Templates are put out for public comment separately. See the PR-05 sections in the Participation Grantee CDBG Templates for the City of Everett and City of Marysville for additional information on administration of their individual CDBG programs.

Contact Information for the Cities of Everett and Marysville are located in PR-05.

The 2025-2029 Consolidated Plan is a five-year strategic plan that assesses local priority needs in the areas of affordable housing and non-housing community development and establishes local goals to guide investment of CDBG, HOME, and ESG funds estimated to be received over the five-year period to help address the identified needs. The 2025-2029 Consolidated Plan covers the period of July 1, 2025, through June 30, 2029. The 2025 Annual Action Plan is the first-year action plan under the 2025-2029

Consolidated Plan and covers the period of July 1, 2025, through June 30, 2026. It identifies the amount of CDBG, HOME, and ESG grant funds available for the 2025 program year for the Snohomish County Consortium and describes how these funds will be used to help meet the five-year goals established in the 2025-2029 Consolidated Plan.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The five-year goals established in the 2025-2029 Consolidated Plan for use of CDBG, HOME, and ESG grant funds to address priority needs in the Snohomish County Consortium area include:

- Affordable housing activities including new and maintained rental housing units, rental assistance, help for homeowners with home repair and rehabilitation, help for first-time homebuyers, and operating support for community housing development organizations,
- Public facility and infrastructure improvements,
- Public services for persons experiencing homelessness or at risk of homelessness, for persons with special needs, and for fair housing activities,
- Emergency shelter and rapid rehousing for persons experiencing homelessness and required data collection and reporting, and
- Grant planning and administration.

For the 2025 program year, the first year of the 2025-2029 Consolidated Plan, a total of \$9,982,410 in funding under the CDBG, HOME, and ESG programs is estimated to be available to the Snohomish County Consortium to help meet the five-year goals. This includes:

- \$3,309,657 in 2025 CDBG Grant Funds,
- \$30,000 in 2025 Estimated CDBG Program Income,
- \$1,802,994.28 in 2025 HOME Grant Funds,
- \$795,862.46 in 2025 HOME Program Income,
- \$1,640,021 in Prior Year CDBG Grant Funds,
- \$2,116,280 in Prior Year HOME Grant Funds, and
- \$287,596 in 2025 ESG Grant Funds.

All of the activities selected to receive funds under the CDBG, HOME, and ESG programs for the 2025 program year through the Snohomish County Consortium will help address priority needs and goals in the 2025-2029 Consolidated Plan. The \$9,982,410 in available grant funds is allocated as follows:

- \$5,511,689 for Affordable Housing Projects & Programs,
- \$2,833,949 for Public Facility & Infrastructure Projects,
- \$500,948 for Homeless, Special Needs, and Fair Housing Service Projects,
- \$266,028 for Homeless Shelter, Rapid Rehousing, and Homeless Management Information System,

- \$869,797 for Grant Planning & Administration

3. Evaluation of past performance

Snohomish County Consortium allocates CDBG, HOME, and ESG funds according to the goals and allocation plan established in the 2020-2024 Consolidated Plan. The goals and allocation plan were developed based on the priority needs assessment conducted for the 2020-2024 Consolidated Plan, the eligible uses of the grant funds and other grant requirements, and the estimated amount of funding projected to be available under the grant programs for the five-year period.

The COVID 19 pandemic required the reprioritization of County and subrecipients previously proposed goals as an effort to address and mitigate the effects of the pandemic. Staff time, social distancing restrictions and isolation, lack of contractors, increased material, and labor costs once business resumed have impacted the Consortium's proposed accomplishments toward annual goals during the 2023 PY.

Progress was made toward CDBG affordable housing goals with the MHRP exceeding the five-year goal by 81% in the fourth year of the five-year Consolidated Plan. The rental housing production goal for the five-year period is at 50%. Three rental housing new construction projects are complete and in the process of close-out, which will add 23 new rental units to the 18 already completed, we anticipate exceeding the five-year goal by the end of the 2024 PY.

Public Facility & Infrastructure

Due to the challenges created by COVID-19, Public Facility and Infrastructure (PF&I) projects have been significantly impacted and public facility and infrastructure projects have not been completed as planned, especially given the lack of construction activities during the pandemic and the recent substantial increase in construction costs and supply chain delays. Public Facilities and Infrastructure projects are now moving forward and projects previously delayed are anticipated to be completed during the 2024PY. Even with the delays, we anticipate that most, if not all, of the five-year Consolidated Plan PF&I goals will be met.

Public Services

The services CDBG annual homeless goal was exceeded by 37% and the five-year goal is at 59% , likely due to the success of the CDBG-CV funding provided for some of the same goals. The ESG rapid rehousing goal exceeded the projected annual goal by 29% and the ESG emergency shelter annual goal was only slightly under the anticipated goal at 73%.

Community Development Block Grant – Coronavirus (CDBG-CV)

On March 27, 2020, the Coronavirus Aid, Relief and Economic Security Act (CARES Act), Public Law 116-136, made available supplemental Community development Block Grant (CDBG) funds to prevent, prepare for, and respond to the Coronavirus (CDBG-CV). Significant progress has been made on the

CDBG-CV1 goals for homeless and non-homeless special needs and the public services Employment Goals.

Coronavirus Aid, Relief and Economic Security Act (CARES Act)

On March 27, 2020, the Coronavirus Aid, Relief and Economic Security Act (CARES Act), Public Law 116-136, made available supplemental Community development Block Grant (CDBG) funds to prevent, prepare for, and respond to the Coronavirus (CDBG-CV).

Snohomish County received \$4,925,992 in supplemental CDBG funding received in two separate awards titled CDBG-CV1 for \$1,830,114 and CDBG-CV3 for \$3,095,878. CDBG-CV1 and CDBG-CV3 funds were added to our existing 2019 Annual Action Plan by way of our Citizen Participation Plan and substantial amendment process.

- A. Snohomish County Legal Services - Legal Assistance in response to the COVID-19 Pandemic, \$200,000. 2023PY Update:** Snohomish County Legal Services program served 2124 individuals with all sources of funding for the project year, exceeding the goal of 700 persons. This was accomplished with 1806 service hours, resulting 116% of persons served reporting that they could effectively understand and enforce their legal rights and 125% of individuals served avoiding eviction exceeded the contracted outcomes and vastly improved lives. The annual goal of serving 250 low and moderate-income individuals in 2023 was met with CDBG dollars, with 44 CDBG eligible persons served.
- B. YWCA of Seattle-King County-Snohomish County – Landlord Engagement Program, \$80,163. 2023PY Update:** The YWCA Landlord Engagement Program served 92 households and 252 individuals in program year 2023 through Quarter 3. Of these 92 households, 38 of 46 households exited were successfully housed through landlord outreach and engagement, achieving 83% of enrolled households. This indicates that an overwhelming majority of participants found this to be their strongest path to permanent housing in a market with skyrocketing prices and a debilitating undersupply. The Landlord Engagement Program continues to work with the 46 households still enrolled and receiving services.
- C. Volunteers of America (VOA)– Prevention Response Project, \$509,778. 2023PY Update:** The project operated through December 2023 (first two quarters of 2023). Navigators continued their partnership with Housing Justice Project, hired to assist clients coming out of eviction court and to provide assistance as needed. The Navigators provide essential capacity to the Eviction Resolution Pilot Program in processing rent assistance before the need for an eviction proceeding. The program goals are to serve 600 people (1/2 of annual goal of 1,200) with CDBG funds and 1,500 (1/2 of annual goal of 3,000) with all funds to assist them in avoiding eviction filings and maintain their access to housing. Over the partial program year 2023, the agency was able to successfully support 703 people, all with these CDBG funds. This puts them at 117% of goal for CDBG funds and 46.6% of

goal for all funds. Of these individuals, 703 were able to avoid eviction filing and maintain their access to housing which exceeds the 75% of all people served by 253 individuals.

- D. Volunteers of America – Renter Certification Program, \$93,026. 2023PY Update:** This project operated for 9 months during project year 2023. The goal of this contract is to serve 1,250 people with all fund sources and 500 with CDBG-CV funds each program year. For program year 2023, 112 individuals were served with both CDBG funds and all fund sources. For program year 2023, the project encountered new challenges as some training partners put trainings and locations on hold and scheduled trainings experienced low attendance. The organization re-evaluated how to advertise the trainings, evaluated new locations for trainings, and considered additional populations to continue to provide Fair Housing trainings coupled with Renter Certification. The organization improved outreach communications via website info and outreach flyers. The organization is working with another agency to provide transportation, meals, and childcare for some training locations and dates. The organization is also expanding their outreach to include refugee and immigrant populations, Veterans, and public housing authorities and will continue their Renters Certification Training.

A total of \$3,095,878 in CDBG-CV3 funds were approved and allocated as follows:

A. Employment Support Services Program

A total of \$1,238,351 in CDBG-CV3 were allocated for the “Employment Support Services Program.” In response to the pandemic, the program will provide outreach and individualized employment services to engage, connect and support individuals and families who are experiencing housing instability or homelessness to obtain and maintain employment stability.

The following agencies were allocated CDBG-CV3 funds to carry out an Employment Support Services Program, as described in the preceding paragraph:

1. Cares of Washington \$379,660
2. Housing Hope \$483,320
3. Orion Industries \$231,332

2023PY Update: Three contracts were executed and started in October of 2022. A total of \$1,094,312 was awarded to three Basic Food Employment and Training (BFET) agencies who are currently providing intensive employment readiness and support services to individuals and family head-of-households with incomes at or below 200% of the Federal Poverty Line and experiencing multiple challenges to accessing and successfully engaging in employment activities. These BFET agencies also provide services that include coordination with and supported connections to the continuum of community employment/job training/education services. For PY2023, 303 individuals have enrolled in employment services and 290 have participated in a job skills or training programs. With employment services support there are 119 job placements for PY2023.

B. Public Facilities & Infrastructure - Snohomish County Fire District 38 - Coronavirus Education Prevention Facility, \$619,176

A total of \$619,176 in CDBG-CV3 funds for costs associated with the design, construction, and purchase costs of a 2600 square foot prefabricated building to be placed on a foundation on Fire District property. The building will be used for classes on prevention, response, and mitigation of COVID-19 and any variant of the virus. The building will additionally serve as an education center and vaccine administration and monitoring facility, as well as an emergency site for the area. The National Environmental Policy Action (NEPA) is almost complete and the contract is being drafted. The project sponsor requested and received, additional CDBG-CV3 funds in the amount of \$148,380. **2023PY Update: Fire District 24 has requested an additional \$600,000 to complete the Coronavirus Education Prevention Facility. The proposed substantial amendment is in process and the 30-day comment period on the proposed project ends on September 17, 2024, and then will be routed to County Council for approval. Included in the amendment is a recommendation that \$50,000 of the 600,000 requested is from contingency funds allocated to the project in the first request for additional funding if needed. The anticipated approval date for the additional funding, if awarded, is October 15, 2024.**

C. Homage Senior Services – Senior Nutrition Meal Transportation Infrastructure Expansion, \$150,000 Plus \$50,000 in Contingency funds if needed

The project includes the acquisition of one or two refrigerated vans to allow for meal delivery to homes through Homage Senior Services - Meals on Wheels program.

2023PY Update: On September 3, 2024, Homage successfully completed the acquisition of two refrigerated vans for the Meals on Wheels program and the vans were delivered to the agency. The addition of the two vans is anticipated to provide assistance to approximately 4,500 persons.

4. Summary of citizen participation process and consultation process

Snohomish County conducted citizen participation and consultation activities for development of the 2025-2029 Consolidated Plan and 2025 Annual Action Plan in coordination with the City of Everett and the City of Marysville. Several opportunities and avenues for input were provided including: initial public hearing in Everett Arlington and virtually; Everett/Snohomish County Continuum Care (CoC) participation and collaboration with local housing authorities, Cities and Towns, housing developers, social services providers, and the Snohomish County Executive's office and Snohomish County Departments through the Housing Affordability Regional Task Force (HART) Report and Five-Year Action Plan; need surveys with input from low-income residents, community organizations, local governments, affordable housing developments, and others. Outreach methods for the public hearings included newspaper ads, email distribution lists, internet postings, press releases, and distribution and posting of flyers. The newspaper ads were published in the Herald, the County-wide newspaper. The flyers were translated into Russian, Spanish, Vietnamese, Korean, Russian, Arabic, Marshallese, and Chinese (simplified) and the hearings were held at accessible location and virtually. Outreach methods for the

public review and comment period included newspaper ads, email distribution lists, internet postings, posting of notices, and availability of draft plan copies at Consortium-member locations, on the County web page, through a press release, and upon request. Comments received during the 30-day public review and comment period for the Draft 2025-2029 Consolidated Plan and 2025 Action Plan.

5. Summary of public comments

One comment was received on the Draft 2025-2029 Consolidated Plan and the draft 2025 Annual Action Plan through the 30-day public review and comment period. The comment indicated “It seems like the state allows for business and housing to be built, and then plans for the infrastructure (power, sewer, roads, drainage, etc.) after the fact, then expects people already living there to pay for it. Should require developers pay for the cost of bettering the infrastructure before building. low and middle-income people that this housing proposal is all about, are always the ones who get hurt.”

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments were considered and no comments were rejected.

7. Summary

The investment of CDBG, HOME, and ESG funds over the next five years in the Snohomish County Consortium area is intended to help maintain and increase decent affordable housing options and to help create more suitable living environments and sustainable communities throughout Snohomish County.

II. The Process

PR-05 Lead & Responsible Agencies - 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	SNOHOMISH COUNTY	Human Services Department
HOME Administrator	SNOHOMISH COUNTY	Human Services Department
ESG Administrator	SNOHOMISH COUNTY	Human Services Department

Table 1 – Responsible Agencies

Narrative

The Snohomish County Consortium is a partnership between Snohomish County and the cities and towns within the County. The partnership allows the Snohomish County Consortium, as an Urban County, to receive funds each year under the CDBG, HOME, and ESG programs as formula grants and to use these funds to address local needs and goals. Snohomish County is the lead agency of the Snohomish County Consortium and the grant recipient of CDBG, HOME, and ESG funds on behalf of the Snohomish County Consortium. In this capacity, Snohomish County is responsible for the overall administration, planning, monitoring, and reporting requirements for these programs, including citizen participation and private and public agency consultation.

The City of Everett and the City of Marysville participate in the Snohomish County Consortium for HOME funds only and are each also direct grant recipients of CDBG funds that benefit their respective jurisdictions. Pursuant to an interlocal agreement, 21% of the HOME funds received each year by the Snohomish County Consortium are set-aside for City of Everett affordable housing projects; the City of Everett carries out some administrative and planning responsibilities related to these HOME funds, with oversight provided by Snohomish County as lead agency. The City of Everett is the lead agency and grant recipient for City of Everett CDBG funds. The City of Marysville is the lead agency and grant recipient for City of Marysville CDBG funds.

Snohomish County, the City of Everett, and the City of Marysville, coordinated and collaborated in preparing this joint 2025-2029 Consolidated Plan and 2025 Annual Action Plan. This document is the Snohomish County Consortium - Lead Grantee Template. The Cities of Everett and Marysville have their own Participating Grantee CDBG Templates, which are not included in this publication, but each conduct their own citizen participation process and public comment periods.

Consolidated Plan Public Contact Information

For additional information or to request a reasonable accommodation to provide the information in this document in an alternate format, please contact:

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PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)

1. Introduction

This section includes a summary of activities to enhance coordination between housing providers and agencies providing services, a summary of coordination and consultation efforts with the Everett/Snohomish County Continuum of Care, and a summary of consultation efforts with public and private agencies and local governments in development of the 2025-2029 Consolidated Plan and 2025 Annual Action Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

The County is the Continuum of Care (CoC) Collaborative Applicant for the CoC. County CoC staff consult and coordinate with a broad range of stakeholders throughout the year via meetings and electronic tools. The County's Consolidated Plan and CoC staff are co-located within the same Division and work collectively together. CoC staff coordinate activities with the Snohomish County Behavioral Health Department, Snohomish County Health Department, CoC Board, the Partnership to End Homelessness (Partnership) and its committees, housing and services providers, and stakeholders. Coordination is achieved through participation in various community partnerships and collaborative efforts, such as the Housing Consortium of Everett and Snohomish County, the Continuum of Care, the Partnership to End Homelessness which has standing committees dedicated to increasing coordination between housing, health and Homeless School Liaison meetings. These partnerships and collaborations provide ongoing opportunities for public and private agencies to coordinate and align efforts around housing, homelessness, direct services, and enhancing systems coordination.

These providers often assist clients in obtaining rental units and in working with landlords to resolve issues that arise so that clients may remain in the units and achieve stability. A local service provider also operates a renter certification program, which receives funding through the County.

The program provides education and assistance to help people with problematic rental histories access the private rental market by connecting with mainstream services to address barriers and conducts outreach to social service programs and landlords. In addition, a coordinated entry system provides a common assessment and intake procedures to streamline access to housing and services for all populations, including the chronically homeless, veterans, and unaccompanied youth. The coordinated entry system connects persons who are at imminent risk of homelessness with a prevention navigator who can connect them with the rental assistance, legal services, landlord mediation and other services needed to stabilize in housing.

A landlord engagement specialist who specializes in recruiting landlords to work with homeless households with barriers to obtaining housing in the private rental market is being funded under one project. An additional project funds a housing retention specialist to work with service providers. It is anticipated that these services will increase housing retention and stabilization for formerly homeless individuals and families who are placed in the private rental market. This crosswalk will ensure that housing agencies are connecting their clients to the services that are appropriate to meet their needs.

As part of its affordable housing application process, the County continues to include a review of whether the appropriate type and level of supportive services will be available where this is relevant to the population served. This helps ensure that housing providers will coordinate with service providers to the extent necessary to connect tenants with the services they will need to maintain housing.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The County is the Continuum of Care (CoC) Collaborative Applicant for the CoC. County CoC staff consult and coordinate with a broad range of stakeholders throughout the year via meetings and electronic tools. The County's Consolidated Plan and CoC staff are co-located within the same Division and work collectively together. CoC staff coordinate activities with the CoC Board, the Partnership to End Homelessness (Partnership) and its committees, housing and services providers, and stakeholders. The County works with these groups in tandem to identify and address the needs of those experiencing or at-risk of homelessness and those with special needs including chronically homeless individuals and families, families with children, veterans and unaccompanied youth. A coordinated entry system provides a common assessment and intake procedures to streamline access to housing and services for all populations, including the chronically homeless, veterans, and unaccompanied youth. The County facilitates the efforts of the Community Outreach Coalition, which conducts street outreach, conducts coordinated entry intake and provide supportive services to unsheltered, chronically homeless individuals and families. The Veterans Homeless Committee (VHC) provides outreach, coordinated entry intake and services, access to VASH and other programs needed by veterans who are homeless, chronically homeless or at risk. Outreach and coordinated entry intake for unaccompanied youth and young adults is conducted by the lead youth agency and is coordinated with other youth services. The coordinated entry system connects persons who are at imminent risk of homelessness with a prevention navigator who can connect them with the rental assistance, legal services, landlord mediation and other services needed to stabilize in housing. Planning and ongoing evaluation of the coordinated entry system is done through the Partnership to End Homelessness Board and a Coordinated Entry Advisory Committee. The following is a summary of CoC coordination with systems of care. The County Human Services Department is part of a collaborative that addresses the needs of seriously mentally ill persons being released from jails.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

The consultation process on allocating ESG funds and developing performance has spanned many years. There were initial measures and evaluation standards that were developed per the Interim Regulations, and then are reviewed as part of the annual funding process and Annual Action Plan. The CoC Collaborative Applicant (CA) met with ESG and CoC agencies and the Continuum of Care (CoC) to review data, evaluate and set local system performance targets based on HEARTH measures, local goals and project and population types. Performance measures and benchmarks are set for each project type, population, and include: HMIS data quality, reducing length of stay in shelter and transitional housing, increasing rate of exit to permanent housing, increasing housing stability for permanent supportive housing, decreasing days to move-in to permanent housing, increasing income and access to mainstream benefits, and decreasing returns to homelessness. Benchmarks are set for ESG funded projects for shelter and rapid rehousing, as those are types of projects that have been funded to date. The County Human Services Department has also implemented a Data Driven Culture Initiative which has resulted in the development of sustainable tools and processes necessary to create/maintain a healthy data ecosystem, while driving more immediate and effective responses to homelessness. This has contributed to the development/expansion of dashboards and data to improve education and performance for the CoC Board and County. As a direct result, the County directly aligns project performance and benchmarks with system level performance measures and benchmarks. System Performance and System Snapshot dashboards have aided the CoC in their effort to better understand successes and challenges of the homeless housing system and make more informed policy decisions and data directed strategies.

The CoC Board's Data and Analysis Committee (DAC) is currently reviewing the adopted performance measures and benchmarks. The DAC is reviewing system performance over the past five (5) years to determine if benchmarks should be adjusted to reflect local systemic change, especially since the pandemic. The DAC is reviewing all adopted performance standards for all local homelessness interventions. Recommendations for any changes would need to be adopted by the CoC Board.

The CoC Board has delegated the CA to consult with State and local ESG recipients in the geographic area on the plan for allocating ESG funds. The CA consults with CoC and ESG subrecipients biannually in a state-wide Homeless Advisory Committee on community needs and ESG allocation priorities. The CA and the HMIS Lead provide Con Plan and ESG staff with local PIT, HIC, HMIS, and ESG-annual outcome data and performance dashboards. Input received is used to help identify priority needs and develop goals that guide investment of ESG funds. All ESG activities are consistent with the CoC Strategic Plan.

The funding recommendations were to continue funding emergency shelters and rapid rehousing, due to the limited funding, and the fact that some prevention is funded through other funding resources. In addition, a limited amount was allocated to HMIS to support both agency data entry and County HMIS

administration. Administration is retained by the County due to the administrative burden and limited administration funds available.

The County administers the HMIS and as the CA works side by side with the CoC Board. The CoC Board approves the HMIS Governance Charter which outlines the management processes, responsibilities, decision-making structures, and oversight of the HMIS. Since the County actually administers HMIS and has legal responsibility for many aspects of HMIS, including accountability for funding, as the HMIS lead, the County is responsible for ensuring that the HMIS is administered in compliance with HUD requirements.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Everett Gospel Mission
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
2	Agency/Group/Organization	Volunteers of America Western Washington
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-homeless Services-Employment Service-Fair Housing Fair Housing, Advocates (Homeless Policy Task Force Representative), veterans
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Housing Community Development Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty. In addition, organization provided input on affordable housing needs at an initial public hearing. Input was taken into consideration during development of the plan and the plan includes funding for a project to provide assistance with security and utility deposits for low-income households to help address the need identified. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
3	Agency/Group/Organization	Catholic Community Services of Western Washington
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless mental health, jail transition discharge services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Input was taken into consideration during development of plan in assessing needs, identifying priority needs, and developing goals and strategies. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
4	Agency/Group/Organization	Interfaith Association of NW WA
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Chair and Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
5	Agency/Group/Organization	Snohomish County Legal Services
	Agency/Group/Organization Type	Services-homeless Civil Legal Services - homeless and low-income
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty.
6	Agency/Group/Organization	Compass Health
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless Services-Health mental health, inpatient facility and jail transition discharge services
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
7	Agency/Group/Organization	YWCA
	Agency/Group/Organization Type	Housing Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
8	Agency/Group/Organization	Cocoon House
	Agency/Group/Organization Type	Housing Services-Children Services-homeless Youth
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Agency is also a member of the Housing Consortium of Everett and Snohomish County.

9	Agency/Group/Organization	Housing Authority of Snohomish County
	Agency/Group/Organization Type	Housing PHA housing vouchers for disabled persons exiting institutions of care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Market Analysis Strategic Plan
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. In addition, the agency was consulted on the public housing sections of this plan through email communications. Input was incorporated into the public housing sections of the plan and was taken into consideration in assessing needs, identifying priority needs, and developing goals and strategies. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
10	Agency/Group/Organization	Senior Services of Snohomish County
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
11	Agency/Group/Organization	Domestic Violence Services of Snohomish County
	Agency/Group/Organization Type	Housing Services-Children Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Input was sought via phone consultation and email communication and taken into consideration during development of the plan in assessing needs, determining priority needs, and developing goals and strategies.
12	Agency/Group/Organization	Everett Housing Authority
	Agency/Group/Organization Type	Housing PHA

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. In addition, the agency was consulted on the public housing sections of this plan through email communications. Input was incorporated into the public housing sections of the plan and was taken into consideration in assessing needs, identifying priority needs, and developing goals and strategies. Agency is also a member of the Housing Consortium of Everett and Snohomish County.
13	Agency/Group/Organization	Housing Consortium of Everett & Snohomish County
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Housing Consortium of Everett and Snohomish County consists of a diverse group of over 45 profit and non-profit organizations working together on affordable housing issues in our community including housing developers, housing service providers, financial institutions, local governments, and individuals. The organization is a member of Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty. County staff also participate in regular meetings of this organization which provides ongoing opportunities for consultation on affordable housing issues throughout the year. Additional opportunities for input on ongoing planning activities related to affordable housing were provided throughout the year in person or via e-mail as part of the countywide planning process. Anticipated outcome is to improve coordination and progress towards addressing affordable housing needs in the community.
14	Agency/Group/Organization	Housing Hope
	Agency/Group/Organization Type	Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Market Analysis Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Organization is also a member of the Housing Consortium of Everett and Snohomish County
15	Agency/Group/Organization	Everett/Snohomish County Continuum of Care
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Snohomish County is the Collaborative Applicant for the Continuum of Care and Continuum of Care staff also provide review for consistency with the Continuum Care plan for CDBG, HOME, and ESG applications.
16	Agency/Group/Organization	Everett School District
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.

17	Agency/Group/Organization	The Salvation Army
	Agency/Group/Organization Type	Services - Housing Services-homeless institutional discharge program
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
18	Agency/Group/Organization	Snohomish County Planning & Development
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Snohomish County Human Services Department and Snohomish County Planning & Development Services Department participate in ongoing coordination meetings throughout the year on affordable housing and related planning efforts of both departments, including both comprehensive planning and consolidated planning efforts. The anticipated outcome is to improve consistency and coordination of efforts. Planning & Development Services also provides review of CDBG public facility and infrastructure applications regarding consistency with county-wide planning policies.

19	Agency/Group/Organization	Snohomish County Human Services-Aging & Disability Services
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation on community needs was conducted via email, in person, and through review of plans and reports. Input was taken into consideration during development of the plan in assessing needs, identifying priority needs, and developing goals and strategies.
20	Agency/Group/Organization	Snohomish County Human Services - Chemical Dependency, Mental Health, & Veteran Services
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Planning organization Chemical dependency, mental health, veterans Grantee Department
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Veterans Non-Homeless Special Needs Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. Consultation was also conducted regarding community needs via e-mail and through participation in Continuum of Care/ESG consultation input meeting. Input was taken into consideration during development of the plan in assessing needs, identifying priority needs, and developing goals and strategies. This department acts at liaison to the North Sound Mental Health Administration which provides discharge planning for Western State Hospital, a publicly funded institution of care/mental health facility.
21	Agency/Group/Organization	Snohomish County Human Services - Division of Early Learning
	Agency/Group/Organization Type	Services-Children Services-Education Early Childhood Learning Grantee Department
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-Poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
22	Agency/Group/Organization	Snohomish County Sheriff
	Agency/Group/Organization Type	Other government - County Law Enforcement

	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
23	Agency/Group/Organization	Providence Regional Medical Center
	Agency/Group/Organization Type	Business Leaders Hospital/Health Care Facility, hospital discharge planning Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as e-mails and surveys. Anticipated outcome of these activities is to improve coordination and to make progress in preventing and ending homelessness and alleviating the effects of poverty.
24	Agency/Group/Organization	Work Force Snohomish
	Agency/Group/Organization Type	Services-Employment
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Economic Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.

25	Agency/Group/Organization	Edmonds Community College
	Agency/Group/Organization Type	Services-Education Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
26	Agency/Group/Organization	Community Transit
	Agency/Group/Organization Type	Regional organization Transportation Major Employer
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
27	Agency/Group/Organization	Department of Social & Health Services
	Agency/Group/Organization Type	Child Welfare Agency Publicly Funded Institution/System of Care social services, foster care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
28	Agency/Group/Organization	Snohomish County Health Department
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Housing Needs Assessment Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency consulted on drug contamination of permanent housing units, fentanyl overdoses in the County, and controlling the spread of communicable diseases/outbreaks in encampments. Input was taken into consideration in assessing needs, identifying priority needs, and strategies and goals.
29	Agency/Group/Organization	Snohomish County Consortium Local Governments
	Agency/Group/Organization Type	Other government - Local Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Non-Homeless Community Development

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Snohomish County sought input on housing needs, homeless needs, non-housing community development needs, anti-poverty strategy, and barriers and strategies to overcome barriers to affordable housing development from the cities and towns in the Snohomish County Consortium through invitations to participate in public hearings and through invitations to participate in on-line surveys conducted for the Snohomish County Human Services Department 2019 Community Needs Assessment and the Snohomish County Human Services Department 2025 Affordable Housing and Community Development Needs Survey. Input was taken into consideration during development of the plan in assessing needs, identifying priority needs, and developing goals and strategies. In addition, the City of Everett and the City of Marysville participated in the Continuum of Care Partnership to End Homeless Board and a subcommittee of the Board, respectively. Opportunity for input through the CoC is provided through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Snohomish County staff have also had in-person consultations on homeless needs and strategies with other local governments in the Snohomish County Consortium. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty. The Cities of Marysville and Everett participated in coordination and outreach during the development of the 2025-2029 Consolidated Plan.</p>
30	Agency/Group/Organization	Snohomish County Jail
	Agency/Group/Organization Type	Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Snohomish County Humans Services Department staff of the Housing & Community Services Division, which includes Continuum of Care staff and Consolidated Planning staff, consult in person and via email with staff of Snohomish County Human Services Chemical Dependency, Mental Health and Veteran Services Division, which administers the Snohomish County Jail Transitions Services program. Memorandums of Understanding exist with the Snohomish County jail and other jails regarding transition services. The program provides eligibility screening and contracts and coordinates with community agencies to provide discharge planning services. Anticipated outcome of continued consultation and coordination is the prevention of discharge of individual into homelessness.
31	Agency/Group/Organization	Snohomish County Human Services - Housing & Community Services
	Agency/Group/Organization Type	Other government - County Grantee Department
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Snohomish County Human Services Department - Housing and Community Services Division includes both Continuum of Care and Consolidated Planning staff. Staff consulted with each other in-person and via e-mail. Anticipated outcome is coordination and consistency in planning efforts and to continue to make progress in preventing and ending homeless, alleviating the of poverty, and addressing affordable housing and community development needs of low and moderate income persons and neighborhoods in the community.
	Agency/Group/Organization	ChildStrive

32	Agency/Group/Organization Type	Services-Children Services-Education Early Childhood Learning
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs – Families with Children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
33	Agency/Group/Organization	Sound Pathways
	Agency/Group/Organization Type	Housing Services - Housing Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs Chemical dependency, mental health
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.
34	Agency/Group/Organization	Tulalip Tribes
	Agency/Group/Organization Type	Other government - Local Housing Services - Housing Services-homeless

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Member of the Partnership to End Homelessness Continuum of Care Board. Opportunity for input is provide through various ongoing planning activities throughout the year via in-person and electronic methods, such as email and surveys. Anticipated outcome of these activities is to improve coordination and make progress in preventing and ending homelessness and alleviating the effects of poverty.

Identify any Agency Types not consulted and provide rationale for not consulting

Efforts were made to encourage input and consult as broadly as possible with all types of agencies and community stakeholders through e-mail distribution lists, newspaper ads, flyers, public hearings, review of published reports, and other outreach efforts.

Many agencies in addition to those listed above, were provided an opportunity for input through on-line surveys conducted as part of the Snohomish County Human Services Department 2023 Community Needs Assessment (CNA). This assessment was underway during development of the 2025-2029 Consolidated Plan and results were used to help assess needs in the areas of non-housing community development, affordable housing, and homelessness.

Snohomish County sought proposals from qualified consultants for professional services to conduct and prepare an Update to the 2019 Analysis of Impediments to Fair Housing Choice (AI) for the Snohomish County Urban County Consortium (the Consortium). Snohomish County made several efforts to update our 2019 Analysis of Impediments to Fair Housing Choice (AI) without success. On May 10, 2024, a Request for Proposals was published in the Herald, the newspaper of general circulation in Snohomish County, and qualified individuals or firms interested in the RFP were able to obtain an RFP package that included background information, responsibilities of the consultant selected, and specific information required in the submittals submitting a proposal to conduct the AI. Submittals were due on June 18, 2024, and one application was received and no contract was issued due to lack of competitiveness.

We enlisted the assistance of the Snohomish County Purchasing Division to conduct an RFP for a consultant to perform the AI, and anticipated this would result in a competitive process and a successful proposal. The RFP was published on July 17, 2024, with proposal due on August 15, 2024, and one proposal was received. Snohomish County chose not to award a contract and instead rely on the 2019 AI.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Snohomish County	The Homeless Strategy in the Strategic Plan is consistent with Continuum of Care goals. In addition, the Priority Needs and Goals in the Strategic Plan related to homeless and at-risk persons are consistent with Continuum of Care goals.
Comprehensive Plan	Snohomish County	Both plans support a diversity of housing options to meet a variety of needs and to provide housing opportunities for all segments of the population.
Housing Affordability Regional Task Force (HART) Report and Five-Year Action Plan	Snohomish County	Both plans address affordable housing issues related to high cost of housing, lack of existing units and the need for additional units of affordable housing and development of strategies to address the need.
Analysis of Impediments to Fair Housing Choice	Snohomish County	Several affordable housing and non-housing community development goals in the Strategic Plan will assist the County in meeting fair housing requirements.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

Snohomish County, as lead agency of the Snohomish County Consortium, sought input and coordination from adjacent units of general local government in implementing the Consolidated Plan through several avenues. Snohomish County, the City of Everett, and the City of Marysville participated in joint planning and coordination meetings during development of the 2025-2029 Consolidated Plan and 2025 Annual Action Plan. This planning and coordination are expected to continue throughout the 2025-2029 Consolidated Plan period, including during development of the Annual Action Plans for successive years and the annual Consolidated Annual Performance and Evaluation Reports.

Consortium-member cities and towns are invited to participate in public hearings and comment periods related to the Consolidated Plan, Annual Actions Plans, and Consolidated Annual Performance and Evaluation Reports (CAPERs) and also post notices and flyers for public hearings and comment periods and make draft documents available for public review at their city and town halls. Consortium-

member cities and towns have representative seats on the Snohomish County Consortium's Technical Advisory Committee (TAC) and Policy Advisory Board (PAB).

Coordination with other local planning efforts is also supported through the application process. Application review for CDBG public facility and infrastructure projects takes into consideration consistency with county-wide planning policies and application review for affordable housing projects takes into consideration consistency with relevant plans such as local government comprehensive plans/housing elements and the Continuum of Care plan.

In addition, various other ongoing coordination and collaboration efforts are expected to continue with, and through, various local, regional, and state groups, including but not limited to: 1) Snohomish County Tomorrow, which provides a forum for the cities, towns, and Snohomish County to collaborate on common growth management issues and periodic reporting on housing characteristics and needs in Snohomish County; 2) The Housing Affordability Regional Taskforce (HART), which was created to bring together elected leaders from cities across Snohomish County and the County Council, to collaboratively address the affordability housing challenge; the Affordable Housing Alliance of Snohomish County, which is an interjurisdictional entity that provides the opportunity for education, technical support, collaboration, and advocacy towards addressing the need for affordable housing throughout the county for participating cities, towns, public housing authorities, and Snohomish County; 3) the Continuum of Care, 4) the Housing Consortium of Everett and Snohomish County, 5) Workforce Snohomish, 6) the Puget Sound Regional Council, 7) the Washington State Department of Commerce, and the 8) the Washington State Housing Finance Commission.

PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Snohomish County followed its approved Citizen Participation Plan (CPP) for the Snohomish County Consortium in development of the 2025-2029 Consolidated Plan and the 2025 Annual Action Plan.

The CPP provides for and encourages citizen participation in development of the Consolidated Plan, the Annual Action Plans, any substantial amendments to these plans, and the annual performance and evaluation report. The CPP encourages participation by all of residents of the county, including low- and moderate-income persons, persons with special needs such as elderly persons and persons with disabilities, and persons of racial and ethnic minorities. The CPP provides for consultation with the public housing authorities and its residents. The CPP also incorporates citizen participation through the Consortium's Technical Advisory Committee (TAC) and Policy Advisory Board (PAB). The TAC is comprised of Consortium-member representatives and citizen representatives, including two citizen seats for low-income persons, two citizen seats for seniors, two citizen seats for persons with disabilities, and two citizen seats for persons of racial/ethnic minority. The TAC assists in the project application review process and makes funding recommendations based on established criteria and met in July 2024, December 2024 and March of 2025. The PAB is comprised of Consortium-member representatives and a citizen representative, makes final project funding recommendations and provides other guidance and recommendations on CDBG, HOME, and ESG program administration, and met in March and April of 2025. In addition, the CPP provides residents with a reasonable opportunity to comment on proposed plans, any proposed substantial amendments to the plans, and the annual performance and evaluation reports.

A summary is provided below of the citizen participation and outreach activities conducted in development of the 2025-2029 Consolidated Plan and 2025 Annual Action Plan. This included initial public hearings and other avenues of input. Snohomish County coordinated development efforts with the City of Everett, City of Marysville, Snohomish County's two Housing Authorities : Housing Authority of Snohomish County (HASCO) and the Everett Housing Authority (EHA) which were conducting outreach for development of their respective five-year Public Housing Agency plans.

The citizen participation and outreach for the 2025-2029 Consolidated Plan and 2025 Action Plan included conducting outreach for the initial public hearings through flyers, which were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified),

publication of ads for initial public hearings, and in the Herald, the newspaper of general circulation in Snohomish County, use of email and the internet, use of the Snohomish County webpage through a press release, and input from low-income residents for the Snohomish County Human Services Department 2023 Community Needs Assessment, and input received through the 2025 Affordable Housing and Community Development Needs Survey.

Publication of the Draft 2025-2029 Consolidated Plan & 2025 Annual Action Plan for a 30-day public review and comment period and additional virtual public hearings provided residents with additional opportunities to comment.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and simplified Chinese. Persons with disabilities Non-targeted/broad community, Residents of Public and Assisted Housing Organizations, Agencies, and Local Governments	Public Hearing held from 5:30 to 7:00 pm on December 12, 2024, in the City of Arlington at the Stilly Valley Center. One person attended. The meeting site was accessible. Language interpreters were available upon request.	No comments were received.	NA	
		Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and Chinese (simplified).	Newspaper ad in the Everett Herald, the newspaper of general circulation, for the public hearing held on December 12, 2025.			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ads	Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments	Five public comments were submitted via email.	See comments for #3 below.		
3	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and simplified Chinese. Persons with disabilities Non-targeted/broad community, Residents of Public and Assisted Housing Organizations,	Internet outreach announcing the public hearing was conducted by sending notices and flyers (Flyers were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified), announcing the public hearing to the affordable housing and community development email distribution lists of interested	Five comments were received via email during the early outreach for the 2025-2029 Consolidated Plan & 2025 Action Plan. The majority of comments were related to the need for more affordable housing and helpful resources (more prevention and consolidated services) to assist homeless households and households at risk of homelessness, especially the elderly; households are severely rent burdened	To view the full comments and responses, please see Appendix 1 to AP-12: Public Comments.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
		Agencies, and Local Governments	organizations, agencies, local governments and other interested persons maintained by the Snohomish County Human Services Department Office of Housing and Community Development, and the Continuum of Care email distribution list maintained by the Snohomish County Human Services Department Office of Community and Homeless Services. The public notice and flyer invited participation and requested assistance in posting flyers about the hearings to help reach program participants and residents, where feasible.	households, with disabled adults and seniors living only on Social security, being the most cost burdened. In addition, a few comments expressed opinions about federal funding being used for things they are not intended for and people receiving benefits that they may not be entitled to.		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and simplified Chinese. Persons with disabilities Non-targeted/broad community, Residents of Public and Assisted Housing Organizations, Agencies, and Local Governments	A virtual public hearing was conducted on April 4, 2025, on the Draft 2025-2029 Consolidated Plan & 2025 Annual Action Plan. Participants were able to ask questions and provide verbal or written public comments. Two residents attended the public hearing. Reasonable accommodations and language interpreters were available upon request.	No comments were received at the hearing.		
		Minorities Non-English Speaking - Specify other language:	Internet outreach announcing the public hearing was conducted by sending notices and		All comments received are considered	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Internet Outreach	Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and simplified Chinese. Persons with disabilities Non-targeted/broad community, Residents of Public and Assisted Housing Organizations, Agencies, and Local Governments	flyers (Flyers were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified), announcing the public hearing to the affordable housing and community development email distribution lists of interested organizations, agencies, local governments and other interested persons maintained by the Snohomish County Human Services Department Office of Housing and Community Development, and the Continuum of Care email distribution list maintained by the Snohomish County		before approval of the plans.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
			Human Services Department Office of Community and Homeless Services. The public notice and flyer invited participation and requested assistance in posting flyers about the hearings to help reach program participants and residents, where feasible.			
6	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Marshallese, Vietnamese, Korean, Russian, and simplified Chinese. Persons with disabilities Non-targeted/broad community, Residents of Public	Newspaper ad for the public hearings were placed in the Everett Herald, the newspaper of general circulation in Snohomish County.	One comment was received. Resident indicated that it seems like the state allows for business and housing to be built, and then plans for the infrastructure (power, sewer, roads, drainage, etc.) after the fact, then expects people already living there to pay for it. Should require developers pay for the cost of bettering the infrastructure before	All comments received were considered in development of the plan.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
		and Assisted Housing Organizations, Agencies, and Local Governments		building. low and middle-income people that this housing proposal is all about, and they are always the ones who get hurt.		
7	Public Meeting	Non-targeted/broad community	A public meeting of the Snohomish County Council General Legislative Session for approval of the final 2025-2029 Consolidated Plan and 2025 Annual Action Plan is anticipated to be held on May or June of 2025.	Comments received, if any, will be stated here after the County Council approves the 2025-2029 Consolidated Plan & 2025 Annual Action Plan.	All comments received will be reviewed and considered before final approval of the plans.	

Table 4 – Citizen Participation Outreach

III. Needs Assessment

NA-05 Overview

Needs Assessment Overview

The Needs Assessment, in conjunction with information gathered through consultations and the citizen participation process, is intended to provide a clear picture of the current needs related to affordable housing, special needs housing, community development, and homelessness in our community. From the Needs Assessment, needs with the highest priority were identified, which formed the basis for the Strategic Plan and the programs and projects to be administered.

The Needs Assessment includes six sections: 1) Housing Needs Assessment, 2) Disproportionately Greater Need, 3) Public Housing, 4) Homeless Needs Assessment, 5) Non-Homeless Special Needs Assessment, and 6) Non-Housing Community Development.

NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

The Housing Needs Assessment section provides a summary of estimated housing needs in Snohomish County.

Demographics	Base Year: 2011	Most Recent Year: 2020	% Change
Population	694,025	817,107	18%
Households	266,331	307,643	16%
Median Income	\$67,777	104,083	54%

Table 5- Housing Needs Assessment Demographics

Data Source: 2007-2011 ACS (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	37,990	37,829	42,664	35,970	144,235
Small Family Households	10,298	12,707	16,426	15,737	84,245
Large Family Households	1,856	4,052	4,080	3,788	12,452
Household contains at least one person 62-74 years of age	10,826	8,942	10,596	8,437	30,045
Household contains at least one person age 75 or older	7,919	6,285	4,632	2,852	6,647
Households with one or more children 6 years old or younger	5,324	6,933	7,681	6,226	19,706

Table 6 - Total Households Table

Data 2016-2020 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	713	580	144	85	1,522	154	28	120	94	396
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	434	619	574	270	1,897	139	164	118	144	565
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	858	1,267	1,028	539	3,692	79	574	362	658	1,673
Housing cost burden greater than 50% of income (and none of the above problems)	13,308	4,527	570	120	18,525	8,204	4,781	2,483	573	16,041

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	2,741	8,992	6,762	2,013	20,508	2,538	5,097	9,026	6,393	23,054
Zero/negative Income (and none of the above problems)	1,039	0	0	0	1,039	745	0	0	0	745

Housing Needs Summary Tables

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	5,939	5,846	2,787	14,572	2,775	3,752	5,132	11,659
Large Related	1,161	1,782	644	3,587	425	1,106	1,242	2,773
Elderly	5,985	3,015	1,174	10,174	6,300	4,024	3,452	13,776
Other	4,682	4,686	3,202	12,570	1,519	1,379	1,861	4,759
Total need by income	17,767	15,329	7,807	40,903	11,019	10,261	11,687	32,967

Table 7 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	1,594	1,594	2,382	1,780	0	4,162
Large Related	0	0	354	354	352	429	297	1,078
Elderly	4,678	1,335	218	6,231	4,447	2,038	796	7,281
Other	0	4,128	1,618	5,746	1,171	0	0	1,171
Total need by income	4,678	5,463	3,784	13,925	8,352	4,247	1,093	13,692

Table 8 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	1,119	1,661	1,212	654	4,646	168	668	436	567	1,839
Multiple, unrelated family households	109	220	312	49	690	40	64	81	204	389
Other, non-family households	79	19	74	105	277	30	4	0	60	94
Total need by income	1,307	1,900	1,598	808	5,613	238	736	517	831	2,322

Table 9 – Crowding Information – 1/2

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 10 – Crowding Information – 2/2

Data Source: 2019
2023 ACS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0- 30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	15,332	6,991	2,318	1,019	25,660	8,579	5,529	3,061	1,461	18,630
Having none of four housing problems	8,032	12,286	14,862	10,258	45,438	6,029	13,015	22,389	23,235	64,668
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 11 – Housing Problems 2

Data 2016-2020 CHAS
Source:

Describe the number and type of single person households in need of housing assistance.

According to the 2019-2023 ACS 5-year Estimates, there are 311,825 households in Snohomish County, 72,437 are single-person households and 30,134 are age 65 and over. Single person households in need of housing assistance are represented in the data tables above and are also included in the elderly and other household categories, both of which include households that experience moderate and severe cost burden. Based on this data and additional information received through the consultation and citizen participation process, single persons in need of housing assistance include a significant number of elderly households, persons with disabilities, homeless households, homeless unaccompanied and parenting youth up to age 24, as well as other low- and moderate-income households.

Cocoon House offers essential services, including shelter and transitional housing, to unaccompanied youth and provides prevention services for youth under 18 years old. These services aim to help youth stay with or reunite with their families, or transition to other safe and stable housing. Additionally, the services assist youth in reengaging in school, attending secondary education, and receiving employment support. Life skills programs prepare youth for adulthood and build their resilience toward achieving greater self-sufficiency and success in the world.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Data sources available provide indicators of the scope of need of housing assistance for persons with disabilities. Data provided by the Housing Authority of Snohomish County (HASCO) and Everett Housing Authority (EHA) of households on wait lists for Section 8 Housing Choice Vouchers, indicate approximately 75% of households qualify for a disability allowance. Based on this data and information received through the consultation and citizen participation process, persons with disabilities in need of housing assistance include, but are not limited to, individuals, families, persons with physical disabilities, and persons with developmental disabilities.

Data from Domestic Violence Services of Snohomish County (DVSSC) is an indicator of the number and type of families in need of housing assistance in our community who are victims of domestic violence, dating violence, sexual assault and stalking. From July 2023 thru June 2024, DVSSC provided emergency shelter to 106 adult victims of domestic violence and 146 children. The supportive housing department provides shelter residents who face barriers to self-sufficiency, transition from homelessness to permanent housing. From 2023 to 2024, DVSSC assisted 99 adults and 163 children. Most of the households served through these programs are extremely low-income, putting them at greater need for housing assistance.

What are the most common housing problems?

The most common housing problem in Snohomish County for both renters and owners is lack of available affordable housing and housing cost burden. There is both a lack of affordable units for rent and single family homes available, at prices low- and moderate-income households can afford, or qualify to rent, based on income. Households are considered moderately cost-burdened if they pay more than 30% of their income on housing and severely-cost burdened if they pay more than 50% percent of their income on housing. Cost-burdened households may have difficulty being able to afford other basic necessities such as food, clothing, transportation, and medical care, especially given the substantial increase in costs of necessities over the past several years, and have fewer financial resources to properly maintain the housing structure and are at a greater risk for foreclosure and eviction. To afford a two-bedroom at fair market rent (\$2,645) in Snohomish County would require an hourly wage of \$50.87 or annual income of \$105,800, or 3.1 full time jobs at minimum wage.¹

Are any populations/household types more affected than others by these problems?

Data Indicates that of the total low- and moderate-income renters, the greatest number affected by cost burden are extremely low-income and low-income households (earning 0% to 50% of the area median income). Extremely low-income renters (earning up to 30% of the area median income) make up the greatest number of renters that are severely cost-burdened. Of the total low- and moderate-income homeowners, the number affected by cost burden and severe cost burden is more evenly distributed among extremely low-income, low-income, and moderate-income households (earning 0% to 80% of the area median income).

The greatest number of cost-burdened renters are small-related families, elderly households, and persons in the “other” households category which includes non-elderly, non-family households which may contain only one person, the householder, or additional persons not related to the householder. In addition, based on input received during the consultation and citizen participation process and in the Snohomish County Consortium 2019 Analysis of Impediments to Fair Housing Choice (AI) ² there is a need for housing that is affordable among all populations and household types throughout the county, with particular groups in need identified as seniors, people with disabilities, people with mental health illnesses, individuals and families experiencing homelessness, homeless unaccompanied youth and parenting youth up to age 24, singles, households with children including single-parent families, and large families. In addition, there is a need for units of all sizes, with the greatest need for smaller units.

¹ Retrieved from: https://nlihc.org/sites/default/files/oor/2024_OOR-washington.pdf

² Retrieved from: <https://snohomishcountywa.gov/685/Analysis-of-Impediments-to-Fair-Housing->

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Between 7/1/2023 and 6/30/2024 (PY2023), 3,136 households who were experiencing homelessness contacted the coordinated entry (CE) system for assistance. About 23% of these households were families with children. There is a notable difference when comparing the household composition of at-risk households who contact CE seeking services to avoid becoming homeless, where just over 50% of the 1,780 households who enrolled during PY2023 were families with children, and just under half of those households (49.4%) had children under the age of six. Families with young children have high childcare costs. According to Child Care Aware of Washington, WA state has the 3rd highest cost for infant care in the US and accounts for 15.4% of household costs for a median income family.³ For single mothers making minimum wage, this cost accounts for 51.5% of their monthly expenses.

Veterans accounted for 3.7% of households entering the CE for homeless prevention assistance. From the first quarter to the last of PY2023, the number of homeless veteran households entering the CE decreased 16.3%, while the number of at-risk veteran households entering CE increased 33% over the same time frame.

Households who entered CE at-risk of homelessness exited the system to a permanent destination at a rate of 64.3%.

Characteristics of those at risk of homelessness include those with extremely low and low incomes who are housing cost-burdened and who have encountered a sudden decrease in income or an increase in rent or other costs. Many have experienced a recent health problem, accident, or family break up resulting in financial crisis. Families with young children are at greater risk than families with older children. Credit, debt, physical health issues and unstable employment history tend to cause housing instability among all households with low and extremely low incomes, including those who are imminently homeless and those formerly homeless households exiting rapid rehousing (RRH). The CE system is used to refer households to available housing project openings within the CoC. The general time-limited nature of Rapid Rehousing (RRH), a rental assistance and case management project type within the homeless housing system, provides opportunities for more households to obtain this critical assistance. This assistance is provided in a manner that increases participant responsibility in paying a portion of their rent, toward 100% at the end of the project term. The average number of quarterly exits from RRH is 182 households. During PY2023, 396 households exited to non-permanent destinations. 52% of these non-permanent exits were households that were unable to locate, secure and move into a

³ Retrieved from [Child Care Data & Statistics - Child Care Aware WA](#)

housing unit during their enrollment. Of non-permanent exits, 72% were to a place not meant for human habitation.

During PY2023, 320 households exited RRH to permanent housing destinations. The most substantial factor in achieving a successful outcome was whether they were able to locate and move into a unit during their enrollment. Of those who moved in, 62.5% exited to permanent housing, versus only 1% who did not move into a unit during their enrollment. Low vacancy rates for affordable housing units is a barrier to housing placement.

Stagnant wage growth and limited access to living wage employment is a limiting factor in households' ability to stabilize in and maintain housing as they near the end of subsidy assistance and maintaining housing stability after exiting. The average income for households at exit for those households that did not move into a unit through RRH is \$1107 per month, while the income at exit for households that did move into a unit was nearly four times that amount. The RRH intervention also assists households in understanding how to access other community-based resources to increase their housing stability and decrease their likelihood of becoming homeless after exiting the project.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Persons are considered at-risk of becoming homeless if they meet the coordinated entry criteria and are at risk of losing housing within two weeks. The intake process explores with the household the reasons they are at-risk of losing housing and if there are any resources, such as family or friends, that can assist them. If it is determined that the household doesn't have the ability to maintain housing without prevention assistance, then they are further assessed and a plan developed to stabilize the household.

During PY2023, 1,780 households contacted coordinated entry for prevention assistance. In the 90 days following their contact with CE Prevention, 6% (109) exited to a homeless destination.

Snohomish County does not currently provide estimates of at-risk populations. The landscape of homeless prevention funding and projects is changing in our community. Snohomish County received federal funding to help stabilize at-risk populations throughout the COVID pandemic. The funding allowed for us to serve and help stabilize many households in this timeframe.

Since this funding has ended, the County began a new eviction prevention model providing longer term supports and services as well as continuing to fund other interventions providing navigation services and mediation. The County has also begun working with organizations operated by and serving the diverse communities in Snohomish County to serve at-risk populations.

The County will continue to assess the level of impact prevention dollars have on the at-risk communities throughout Snohomish County and the prevention interventions currently provided.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

The primary housing characteristic linked with instability and an increased risk of homelessness is the lack of affordable housing. Snohomish County rents are high, especially in areas of the county where public transportation and services are located, making it difficult for cost-burdened households to live near services and on transportation lines. Due to the lack of affordable housing, households double up with family and friends. These households are at times on the verge of losing housing, due to overcrowding and other relationship or financial factors. Another factor can be high utility bills, which are often coupled with a lack of energy-efficient units. Another characteristic is housing that has deteriorated and becomes unsafe or unlivable; when this is coupled with a lack of resources to relocate, the household becomes at-risk of homelessness. Finally, over-crowded housing may result in individual or family characteristics exacerbating mental health issues or interpersonal issues resulting in conflict or increased financial burden on the primary household which may put individuals or families at increased risk of homelessness.

A household's risk increases if multiple housing risk characteristics occur simultaneously or concurrently. Fewer households would face this type of housing crisis if they were able to find housing that is affordable in relation to their income and expenses.

Discussion

Characteristics of individuals and families who are currently entering the homeless system include those with extremely low incomes or low incomes who are housing cost-burdened and who have encountered a sudden decrease in income or increase in rent or other costs. Many have experienced a recent health problem, accident, job loss or family break up that resulted in financial crisis. Credit problems and debt, physical health issues, and unstable employment history tend to cause housing instability among all households with low- and extremely low incomes, including those who are entering the homeless system for the first time and/or living in cars or other places not meant for habitation. Many unstably housed or couch surfing individuals and families ultimately become homeless because they cannot obtain their own housing due to landlords not wanting to rent to people with poor credit history, past evictions, and criminal history.

Behavioral health issues, including mental illness and chronic substance abuse, are risk factors for homelessness and these issues are present particularly with the population living in places not meant for habitation such as on the streets or in vehicles. Behavioral health issues, in turn, are exacerbated by the experience of homelessness. The stresses and negative health effects of homelessness and serious mental illness (SMI) compound one another; individuals and families experiencing both homelessness

and SMI issues face higher mortality rates, become involved with the criminal justice system, experience health complications, and are more likely to face victimization than the general population.⁴

The primary need of homeless individuals and families is rapid placement back into housing. Households who are rehoused quickly endure less trauma and stabilize faster. If the household cannot be immediately rehoused, families with children in particular need access to emergency housing vouchers while they pursue permanent housing options so that children can continue going to school and engaging in day-to-day activities which can help minimize the trauma and dislocation. Interviews with formerly homeless families with children have shown that there is a direct correlation between the extent of trauma and dislocation that children endure while homeless and the extent of the family's housing instability once they are housed. Households who endure lengthier periods of homelessness and greater amounts of dislocation and trauma are at an increased risk of becoming homeless again.

Most homeless individuals and families need assistance with the financial costs associated with moving into a new unit in order to get off the streets. They often need assistance talking to landlords, paying increased damage or utility deposits due to poor credit histories, and paying screening fees. Many would benefit from limited time rent assistance to regain stability. Those with disabilities often need assistance gathering the necessary paperwork or assessments necessary to document their disability for housing programs or social security income. Once housed, these individuals and families need assistance managing issues like chronic illness, substance abuse, and mental health. Because subsidized housing opportunities are minimal, these individuals and families also need to be connected with services and opportunities that can help them ultimately become employed at a living wage. Not all individuals are job ready and basic adult education, life skills coaching, and apprenticeship programs are sometimes a necessary first step to employment.

⁴ Treatment Advocacy Center, Homelessness and Serious Mental Illness, November 2024. Retrieved from https://www.tac.org/reports_publications/serious-mental-illness-and-homelessness/

NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

A racial or ethnic group has a disproportionately greater housing need in comparison to the needs of the whole when the percentage of persons in a housing category of need who are members of particular racial or ethnic group are at least 10 percentage points higher than the percentage of persons in that housing category of need as a whole.

This section includes a review of disproportionate need for the following four housing problems: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) overcrowding with more than one person per room, and 4) cost burden of greater than 30%.

Disproportionate need was assessed using the 2016-2020 CHAS data in the tables below. Each table provides data for the jurisdiction and each racial and ethnic group at a different income level: 1) extremely low-income households (0% to 30% of Area Median Income), 2) low-income households (30% to 50% of Area Median Income), 3) moderate-income households (50% to 80% of Area Median Income), and 4) middle-income households (80% to 100% of Area Median Income).

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	28,015	5,925	2,236
White	20,319	4,589	1,506
Black / African American	998	200	0
Asian	2,345	434	345
American Indian, Alaska Native	332	56	19
Pacific Islander	98	25	10
Hispanic	2,796	318	255

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	23,836	9,037	0
White	17,125	7,504	0
Black / African American	849	148	0
Asian	1,734	493	0
American Indian, Alaska Native	201	60	0
Pacific Islander	145	84	0
Hispanic	3,147	585	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,223	17,355	0
White	14,373	13,430	0
Black / African American	609	580	0
Asian	1,461	912	0
American Indian, Alaska Native	178	208	0
Pacific Islander	160	30	0
Hispanic	1,837	1,619	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	11,146	20,956	0
White	8,067	16,668	0
Black / African American	365	838	0
Asian	1,312	1,145	0
American Indian, Alaska Native	82	208	0
Pacific Islander	75	175	0
Hispanic	829	1,270	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

Discussion

Based on the data, the following racial and ethnic groups were assessed to disproportionately experience one or more of the four housing problems to a greater extent than the population as a whole:

- Hispanic households in the low-income category, (30% to 50% AMI),
- Pacific Islander households in the moderate-income category; (50% to 80% AMI), and
- Asian households in the middle-income categories, (80% to 100% AMI).

NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

For purposes of the Consolidated Plan, based on HUD guidelines, a racial or ethnic group has a disproportionately greater housing need in comparison to the needs of the whole when the percentage of persons in a housing category of need who are members of a particular racial or ethnic group are at least 10 percentage points higher than the percentage of persons in that housing category of need as a whole.

This section includes a review of disproportionate need for the following four severe housing problems: 1) lacks complete kitchen facilities, 2) lacks complete plumbing facilities, 3) overcrowding with more than 1.5 persons per room, and 4) cost burden of greater than 50%.

Disproportionate need was assessed using the 2016-2020 CHAS data in the tables below. Each table provides data for a different income level: 1) extremely low-income households (0% to 30% of Area Median Income), 2) low-income households (30% to 50% of Area Median Income), 3) moderate-income households (50% to 80% of Area Median Income), and 4) middle-income households (80% to 100% of Area Median Income).

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	23,099	10,819	2,236
White	16,814	8,111	1,506
Black / African American	849	343	0
Asian	1,853	926	345
American Indian, Alaska Native	227	162	19
Pacific Islander	88	35	10
Hispanic	2,386	719	255

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2016-2020 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,096	20,771	0
White	8,155	16,486	0
Black / African American	545	446	0
Asian	950	1,264	0
American Indian, Alaska Native	114	147	0
Pacific Islander	145	84	0
Hispanic	1,853	1,878	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data 2016-20120 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	5,351	31,247	0
White	3,536	24,237	0
Black / African American	200	989	0
Asian	643	1,751	0
American Indian, Alaska Native	75	319	0
Pacific Islander	115	75	0
Hispanic	595	2,858	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%.

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,090	29,915	0
White	1,407	23,269	0
Black / African American	160	1,033	0
Asian	303	2,175	0
American Indian, Alaska Native	48	242	0
Pacific Islander	10	240	0
Hispanic	124	1,980	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Based on the data in the charts above, the following racial and ethnic groups were assessed to disproportionately experience one or more of the four severe housing problems to a greater extent in comparison to the population as a whole:

- Blacks, Hispanics and Pacific Islanders households in the low-income category, (30% to 50% AMI),
- Asian and Pacific islander households in the moderate income category, (50% to 80% AMI),
- American Indian and Alaska Native households in the middle-income category, (80% to 100% AMI).

NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

Based on HUD guidelines and for the purposes of the Consolidated Plan, a racial or ethnic group has a disproportionately greater housing need in comparison to the needs of the whole when the percentage of persons in a housing category of need who are members of a particular racial or ethnic group are at least 10 percentage points higher than the percentage of persons in that housing category of need as a whole.

This section includes a review of disproportionate need for the following two housing problems: 1) cost burden, and 2) severe cost burden.

Disproportionate need was assessed using the 2016-2020 CHAS data in the tables below. Each table provides cost burden information for the jurisdiction and each racial and ethnic group, including no cost burden (less than 30%), cost burden (30 to 50%), and severe costs burden (more than 50%).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	193,083	51,743	37,186	2,345
White	154,609	38,982	27,514	1,601
Black / African American	4,583	1,221	1,439	0
Asian	15,535	4,448	3,097	355
American Indian, Alaska Native	1,315	343	381	19
Pacific Islander	597	165	203	10
Hispanic	10,585	4,912	3,302	259

Table 20 – Greater Need: Housing Cost Burdens AMI

Data 2016-2020 CHAS

Source:

Discussion

Based on the data, no racial or ethnic group was assessed to disproportionately experience moderate cost burden or severe cost burden to a greater extent than the population as a whole.

NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Asians, Pacific Islanders, Blacks/African American, and Hispanic households were assessed to have disproportionately greater need at some income levels in some housing problem categories.

If they have needs not identified above, what are those needs?

No additional housing needs have been identified.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

HUD defines a racially or ethnically concentrated area of poverty (R/ECAP) as having a non-white population of 50% or more, where 40% or more of the population is at or below the poverty line (or the poverty rate is greater than 3 times the average poverty rate in the area). Snohomish County does not have any census tracts that have non-white populations of 50% or more. Areas of disproportionate concentration are those in which there is a greater than 10% difference than the jurisdiction as a whole. There are no areas in the Consortium where a non-white race meets that definition for a disproportionate concentration.

People of color in the Consortium are more concentrated in the southwest area of the County. 10% of the overall County population is Hispanic, with the largest percentage of the County's Hispanic populations located in smaller towns, census designated places, and unincorporated Snohomish County with the exception of the City of Everett, where the second largest percentage of Hispanic populations are located.

Black/African American, Asian, and Native Hawaii and Pacific Islanders have higher population percentages in Mountlake Terrace and Lynnwood, than their percentages in the overall Consortium population. Alaska Native/American Indians have higher population percentages in Gold Bar, Stanwood and Arlington areas, and Asians have higher population percentages in Mill Creek and Mukilteo.

NA-35 Public Housing - 91.405, 91.205 (b)

Introduction

The City of Everett, the City of Marysville, and the Snohomish County Urban County Consortium are served by two public housing agencies. The Public Housing section provides a summary of the needs of Everett Housing Authority (EHA) and Housing Authority of Snohomish County (HASCO) and characteristics of residents served, race and ethnicity of residents served, and additional narratives. Information in the tables below is updated with current information provided by EHA and HASCO.

The Housing Authority of Snohomish County (HASCO) was established in 1971 to provide affordable housing, enhance quality of life, and build safer and stronger communities outside the City of Everett. HASCO administers a HUD Section 8 Housing Choice Voucher Program that provides rental assistance for very low-income and extremely low-income households. The program assists approximately 3,800 households annually. HUD has designated 677 of these vouchers to provide assistance to specific special needs populations, including non-elderly persons with disabilities, veterans, families involved in the child welfare system, and youth aging out of foster care. HASCO also operates and maintains other affordable rental housing units throughout Snohomish County.

The Everett Housing Authority (EHA) was established in 1942 and its mission statement is to lead the community in developing and providing safe and affordable quality housing for Everett's diverse low-income families. EHA administers a HUD Section 8 Housing Choice Voucher Program that provides rental assistance for very low-income and extremely low-income households. Everett Housing Authority currently has 3,752 Housing Choice Vouchers, of which 1,361 have been designated as Project-Based Vouchers, which provide assistance to specific special needs populations, including senior and/or disabled households, victims of domestic violence and their dependents, homeless families, and young parents. EHA also operates and maintains 2,179 other affordable rental housing units throughout the City of Everett and portions of unincorporated Snohomish County within its jurisdiction. Of these, 1,071 are assisted with EHA Project-Based Vouchers and are included in the count of vouchers above.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	1	27	832	9,748	1,123	8557	459	50	657

Table 21 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Alternate Data Source Name:

HASCO and EHA Provided Voucher Statistics

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	1	1	1	81	34	47	41	1
# of Elderly Program Participants (>62)	0	3	250	2702	368	2331	194	0
# of Disabled Families	1	22	203	4224	317	3875	279	0
# of Families requesting accessibility features	2	49	1035	5538	617	4734	76	0
# of HIV/AIDS program participants				0	0	0	0	0
# of DV victims				0	0	0	0	0

Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	1	24	638	7905	874	6744	330	42	497
Black/African American	0	1	53	1022	127	856	48	8	73
Asian	0	1	118	401	47	343	5	1	23
American Indian/Alaska Native	0	1	12	234	16	201	2	5	25
Pacific Islander	0	0	11	110	22	69	5	5	15
Other	0	0	0						
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 22 – Race of Public Housing Residents by Program Type

Alternate Data Source Name:
HASCO and EHA Provided Voucher Statistics
Data Source Comments:

Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic		1	52	490	55	406	13	11	46
Not Hispanic	1	26	780	9258	1068	8133	375	49	611
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 23 – Ethnicity of Public Housing Residents by Program Type

Data Source:

HASCO and EHA Voucher Statistics

Data Source Comments:

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The pre-application form completed by applicants for EHA's programs does not request information about required accessibility features. Applicants request these features during the eligibility review process. Requested unit types or modifications include units without stairs, wheelchair accessible units, grab bars, and strobe lights for the hearing impaired.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance?

As of January 2025, HASCO's waiting list included 468 individuals for Housing Choice Vouchers (Section 8). The average number of days on the HASCO waitlist is 2,759 days. Families make-up more than half of the waitlist. HASCO's Section 8 waiting list is closed.

Of the 468 individuals on the waitlist, 22.5% qualify for an elderly allowance, 80% qualify for a disability allowance, and 65% are female-headed households. The average family size is 1.9 persons and the average age of the head of household is 45. The greatest need is for small units, with 47.22% needing a studio or one-bedroom unit, 23.93% needing a two-bedroom unit, 11.54% needing a three-bedroom unit, and 4.42% needing a four-bedroom or larger unit.

As of January 2025, EHA's waitlist included 338 families for Housing Choice Vouchers (Section 8). Of the 338 families, 14% qualify for an elderly allowance and 71% qualify for a disability allowance. The greatest need is for small units, with 44% needing a studio or one-bedroom unit, 23% needing a two-bedroom unit, 12% needing a three-bedroom unit, and 20% needing a four-bedroom or larger unit. EHA's Section 8 waiting list is currently closed.

Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Current needs of Housing Choice vouchers holders and/or public housing residents identified by HASCO Staff include: additional wheelchair accessible units available to voucher holders (including units that can accommodate large wheelchairs or scooters); more units that are affordable to voucher holders; more studios and one-bedroom units; programs or funding that can provide such items as utility deposit assistance, furniture, and other household items; legal aid to help voucher holders clean up past tenancy-related issues; landlord education/outreach to encourage more landlords to rent to voucher holders and reduce the stigma about the program; mental health counseling; substance abuse treatment beds and counseling; eviction prevention services for voucher holders with failed Housing Quality Standards inspections and other barriers to remaining housed; employment services for households with serious barriers to obtaining and maintain employment, more housing options near

rapid transit and job centers; childcare access and subsidies/assistance; short-term case management/navigation of community services (to help families dealing with a crisis like an illness or death, assistance completing paperwork, accessing services, etc.); and transportation assistance.

How do these needs compare to the housing needs of the population at large

The substantial need for additional affordable housing in the Snohomish County population as a whole is reflected in the number of households on HASCO and EHA wait lists for Section 8 Housing Choice Vouchers. These wait lists reflect significant need for small units (studios & one-bedroom units) and housing for seniors and people with disabilities, which are also reflected in county-wide needs for the overall population.

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

The Homeless Needs Assessment section describes the nature and extent of sheltered and unsheltered homelessness in Snohomish County.

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	222	41	3,378	2,560	1,009	130
Persons in Households with Only Children	19	1	242	169	52	48
Persons in Households with Only Adults	295	583	4,577	3,699	806	120
Chronically Homeless Individuals	183	402	1,895	1,478	339	120
Chronically Homeless Families	40	24	223	151	79	169
Veterans	13	30	203	170	68	121
Unaccompanied Child	19	1	171	154	50	36
Persons with HIV	0	9	62	46	10	125

Table 24 - Homeless Needs Assessment

Data Source Comments:

Data pulled from 2024 Point in Time Count (Sheltered and Unsheltered data points) as well as the HMIS (Emergency Shelter, Transitional Housing, Coordinated Entry for Literally Homeless, and Street Outreach projects) for PY2023 (7/1/2023-6/30/2024) for the remaining four columns.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that person experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Not applicable.

Nature and Extent of Homelessness: (Optional)

Race and Ethnicity:	Sheltered:	Unsheltered (optional)
White	284	438
Black or African American	74	42
Asian	14	8
American Indian or Alaska Native	20	46
Native Hawaiian or Pacific Islander	51	10
Middle Eastern or North African	0	2
Multiple Races	62	43
Hispanic/Latina/e/o only	31	36

Alternate Data Source Name:

Homeless Management Information Systems

Data Source

2024 PIT Count

Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

During PY2023, 1,511 families with children under 18 who were served in an Emergency Shelter, Transitional Housing, Coordinated Entry, Street Outreach, or Permanent Housing project, 493 of these families enrolled during PY2022.

Of the 950 families who exited in PY2023, 448 exited to permanent housing. The project with the greatest percentage of permanent exits was Rapid Rehousing (73%), following by Permanent Supportive Housing (62%), and Other Permanent Housing (59%).

Most families who were served during PY2023 had a woman as the head of household (80%). For those served during PY2023, 62% of women, 100% of non-binary people, 67% of transgender people, and 25% of men stated they were survivors of domestic violence.

Persons under the age of 45 accounted for 86% of heads of households. Only 10% of households had a head of household under the age of 25, while 0.6% of heads of household for families with children were 65 or older. Those families with young adult heads of household more frequently entered the system from an unsheltered living situation than from sheltered homelessness.

The heads of household for homeless families served during PY2023 were primarily White (71%), followed by Black, African American, or African, and Hispanic/Latin(a/e/o) (both at 16%). Asian households are underrepresented in family homelessness comprising 12.9% of the County, and only 2% of homeless families. American Indian, Alaska Native, or Indigenous families are overrepresented (1.0% in the census vs. 6% of family homelessness).

There were 57 Veteran families with children served during PY2023 Of the 25 which exited during the period, 17 exited to a permanent housing situation. The successful exit rate for Veteran families with children from Rapid Rehousing was 67%. In contrast to other homeless families with children, veteran families reported having a man as head of household in 72% of cases.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In late 2023, Snohomish County published a report, [Snohomish County HMIS Equity Analysis](#). The report noted that all race categories (excluding White and Asian or Asian American) are represented at a higher proportion in the homeless housing system, both in Emergency Shelter and Coordinated Entry when compared to Census data. According to the Poverty Census (ACS, 2023 5-Year estimates), 14% of persons in poverty belong to a race other than White, compared to 25% of households who accessed coordinated entry for literally homeless assistance during PY2023.

Data Source	Census	Poverty Census	2024 PIT	PY2022 Coordinated Entry
American Indian or Alaska Native	1%	11.6%	5.9%	3%
Asian	12.9%	6.2%	1.9%	1%
Black or African American	3.6%	11.9%	10.2%	11%
Multi-Racial	10.6%	9.8%	5.5%	7%
Native Hawaiian or Pacific Islander	0.5%	29.3%	5.4%	4%

While Hispanic/Latin(a/e/o) persons are underrepresented in the 2024 Point In Time Count compared to the Census (11.8% in the Census vs. 5.8% in the PIT), they were overrepresented in Coordinated Entry during CY2022 (14%). Furthermore, Hispanic/Latin(a/e/o) households were also overrepresented in unaccompanied youth (under 18), accounting for 19% of child-only households in homeless programs (HMIS, PY2023).

The equity analysis report also notes that, once enrolled in Coordinated Entry, participants who are American Indian, Alaska Native, or Indigenous, Multi-Racial, and Native Hawaiian or Pacific Islander reflect a lower proportion of those receiving housing referrals. Conversely, when compared to the county Census, those who are White and Multi-Racial receive housing referrals at the same proportion as the County demographics, but all other race and ethnicity categories are differently represented.

The equity analysis was the initial step of a three-phased assessment to identify barriers and assess equal access to services and resources. Phase two will collect information from organizations, persons accessing services, persons with lived expertise, and housing and services providers to complete a qualitative report into equity of the homelessness housing system. The final phase will combine the mixed methods of both the data/quantitative information and qualitative feedback to help inform and drive changes in strategy, policy, collaborations, and practices required to ensure equitable housing security for the culturally diverse communities within Snohomish County.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The number of unsheltered households entering Coordinated Entry each year has grown 13% from 2,419 in PY2022 to 2,729 in PY2023. Utilizing this data from the coordinated entry system, it appears that unsheltered homelessness is on the rise. A total of 6,848 households were served by projects for people experiencing literal homelessness during PY2023. Of those who enrolled during the period (4,510), 81% came from unsheltered homelessness. Veteran households had a higher rate of unsheltered homelessness at entry with 89% vs 80% for non-Veterans. Households with either men or women as head of household had the same rate of unsheltered homelessness (81% for each, after rounding). Non-binary heads of household entered as unsheltered at a lower rate (68%), and transgender heads of household entered as unsheltered more often (95%). Families with children had the highest rate (87%) of entering from unsheltered homelessness, followed by adult only households (81%). Households with only children had a rate of 45%.

Shelters served 1,744 households with an average length of stay in shelter of 72 days. This varied greatly by household type as child-only households had the briefest stays (14 days), followed by households with only adults (75 days) and households with children (101 days). Households with men as head of household stayed on average 70 days, while those with women as head of household stayed for 75 days, transgender heads of household stayed 222 days, and non-binary and gender-questioning heads of household had the shortest stays, at 22 and 7 days, respectively.

Describe the Jurisdictions Rural Homeless Population

The CoC is not considered a rural CoC, though it does have some urban and rural areas. Households counted during the 2024 Point-in-Time Count (PIT) reported becoming homeless while living in a predominantly rural Snohomish County zip code at a rate of 17% which is greater than the total County population living in rural areas based on the 2020 U.S. Census at 12%. Our community's outreach staff reports that persons residing in rural areas are more reluctant to engage in services, especially if it means going into the more urban areas for follow-up services, and they face more barriers in doing so. Access to transportation, affordable housing, meal programs, mental health support, medical care, and drug treatment all present challenges in terms of supply versus demand, but persons residing in rural areas experience the added challenge of proximity to services. Snohomish County has established outreach protocols to enhance outreach and access to services through activities intended to engage homeless persons in services. The Outreach Coalition provides cross-system collaboration with homeless housing and service organizations, behavioral health and physical health organizations, law enforcement embedded social workers (LEESW) including SCOUT outreach teams embedded with the local County Sheriff's department, and Veterans Affairs to identify and locate those experiencing homelessness, coordinate outreach and engagement efforts. In particular LEESWs work across the county, including rural areas to identify and locate individuals experiencing homelessness, connect to housing and essential services. Snohomish County and six cities operate LEESW programs in partnership with Law Enforcement.

Discussion:

City of Marysville: Marysville represents 8.9% of the County population, and, similarly, people reporting they stayed in Marysville the night before comprised 8.3% of the 2024 Unsheltered Point in Time count. The median age for the head of household is slightly older, at 47 vs 43 for all other locations. There was a higher proportion of women as heads of household (45% v 32%), and a higher proportion of heads of household reporting that they were White (82% vs 70%). In July 2023, there were 21 households who enrolled in Coordinated Entry as literally homeless and reported sleeping in Marysville the night before entry; in June 2024 this number has risen to 24, a 14% increase.

City of Everett: Everett accounts for 13.4% of the County populations, but 44% of the 2024 Unsheltered Point in Time count respondents stated they stayed in Everett on the previous night.

The proportion of Black and African American heads of household experiencing unsheltered homelessness in Everett during the 2024 PIT was higher than those experiencing homelessness elsewhere in the County (8% vs 6%). Conversely, people who are White were underrepresented in the unsheltered Everett homeless population at 66% vs 70% throughout the rest of the County on the night of the PIT. The median age of unsheltered heads of household was 40, compared with 43 for the rest of the County, and Everett saw a slightly lower proportion of women heads of household (30% vs 32%). The number of active households in coordinated entry for literally homeless reporting they stayed in Everett the night before enrollment has increased 21% from 117 to 142 between July 2023 and June 2024.

High System Utilizers – Most Vulnerable Community Members: Households must complete a housing assessment in coordinated entry to be considered for housing placement. Part of this assessment includes a vulnerability assessment. Looking at the top 51 individuals by score from PY2023, we can gain a clearer understanding of the barriers our most vulnerable community members are experiencing.

Many of the most vulnerable homeless individuals are single adults who are extremely low income and have chronic health issues, physical disabilities, developmental or cognitive disabilities, co-occurring substance abuse and mental health disorders or co-occurring disorders combined with a chronic medical condition. Out of 51 individuals, 46 reported a mental health issue, 37 reported a substance use disorder, and 28 reported having both a mental health issue and substance use disorder. Additionally, 33% of these top scoring individuals were 50 years or older, with many of them experiencing chronic homelessness (having a disabling condition and being literally homeless for a continuous year or more or having 4 or more episodes of homelessness within the last three years totaling 12 months or more).

Individuals with these conditions tend to cycle in and out of homelessness or at-risk situations and because of their medical and psychological fragility, tend to consume emergency services provided by multiple systems of care including law enforcement, paramedics, emergency rooms and triage centers at extremely high rates.

Many of these high utilizers have no social supports and are medically fragile with critical needs which, when neglected due to lack of stable housing, tend to result in long institutional stays and ever-increasing utilization of the aforementioned service systems. They experience increased and complex challenges in providing for their basic needs and navigating mainstream programs and services, so they often turn to emergency services as a first resource when their conditions become unmanageable or life threatening. Due to these complex challenges, this population in particular may benefit from a coordinated systems approach which combines low-barrier housing with client-centered services to facilitate sustained connections with community-based supports and increased housing stability.

NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)

Introduction

The Non-Homeless Special Needs Assessment section assesses the housing and supportive housing needs for non-homeless persons living with special needs including the elderly, frail elderly, persons with disabilities (physical and cognitive), persons with mental illness, persons with alcohol or other drug addictions, and persons living with HIV/AIDS and their families.

Elderly and frail elderly households make up a substantial number of cost-burdened households who have a significant need for affordable housing. As the number of persons in this age group are projected to increase substantially over the next twenty years, it is anticipated that there will be an increased need in housing types to accommodate this growth including: small units, multi-family housing, senior housing, assisted living facilities, group homes, and accommodations to help people age in place. In Snohomish County 15.4% of the population is 65 years and older, 9.1% are 65 to 75 years, and 1.5% are over 85 years of age.⁵

Another aspect affecting housing for seniors and elderly is the continued increase in space rents for mobile and manufacture home parks, which is one of the last affordable housing options available to seniors who are being priced out of the market. Many seniors are on fixed incomes and are paying more than 50% of their income for housing, putting them at greater risk of becoming homeless.

Persons With Disabilities (physical and cognitive) may have lower employment rates, lower median incomes, and higher poverty rates than the population as a whole and are more likely to be cost-burdened and have a greater need for affordable housing. This is reflected in data from the Housing Authority of Snohomish County and Everett Housing Authority data (Section NA-35 & MA-25) where persons with disabilities are over-represented compared to the population as a whole. The needs of persons with disabilities can vary widely and may need in-home personal care support, chore services, and accessible transportation and facilities that provide nursing or long-term institutional support. The 2019 Analysis of Impediments to Fair Housing Choice identified persons with disabilities need increased affordable housing options, short-term personal care and other supportive services, accommodations to housing units for disabilities, and education to landlords and property managers on reasonable accommodations.

Persons With Mental Illness struggle with providing safe and affordable housing for adults with severe and persistent mental illness. Additional services to support individuals with severe mental illness to live independently are also needed. Housing and supportive service needs of persons with mental illness.

⁵ 2019 – 2023 American Community Survey five-year Estimates

Snohomish County also has a Crisis Triage Facility, providing short-term treatment (3-5 days) to adults who are experiencing a behavioral health crisis. For adults who need ongoing 24/7 support, Adult Family Homes, licensed through the Department of Social and Health Services, may be an option.

Persons with Substance Use Disorders often face housing instability due to burnt bridges with their support networks and diminished capacity as their addictions progress. When people exit residential treatment and transition to community-based care they are particularly at risk homelessness. More affordable housing options and increased treatment services are needed. Detox and outpatient treatment are available to low-income individuals with a substance use disorder. Assistance for people exiting residential treatment and transitioning to community-based care is needed due to the risk of homelessness; a limited pilot program is just beginning to help address this need for individuals who are literally homeless.

The Snohomish County Diversion Center is a 44-bed facility (32 men and 12 women) offering short-term placement and shelter to homeless adults with a substance use disorder and other behavioral health issues, diverting them away from incarceration and toward treatment. Residents undergo a thorough needs assessment and assertive engagement into available services, medication assisted treatment options, and individualized support and recovery plan development.

In partnership with Pioneer Human Services, Snohomish County Human Services Department opened the Carnegie Resource Center (CRC) in Everett. The CRC operates as a service hub for individuals across Snohomish County, providing them with the opportunity to become connected to a wide range of community services, including housing, mental health, and substance use treatment.

Domestic Violence Services of Snohomish County (DVSSC) is the key organization providing support to victim of domestic violence in Snohomish County. They offer a 24-hour support line, supportive services, emergency shelter and supportive housing. Supportive services include legal advocacy (assistance filling out civil protection orders, information on navigating the civil legal system, emotional support during the protection order proceedings and referrals to legal resources), support groups, children's programs, community education and advocacy.

Advocacy programs in Snohomish County, such as those offered by DVSSC and other organizations like the YWCA Everett and Cocoon House, play a crucial role in supporting victims of domestic violence.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

The Snohomish County Consortium includes cities and towns of different sizes located in both urban and rural areas. Public facility needs include facilities providing public services, community services, and facility accessibility improvements. Public service facilities include parks and recreational facilities, libraries and fire stations. Community service facilities include senior centers, youth centers, family and community support and resource centers, center for persons with disabilities, day centers for persons experiencing homelessness, childcare and early childhood education centers, and health care and behavioral health care facilities.

Snohomish County consistently receives application requests for public facility projects that exceed the amount of funding available and for a wide variety of types of projects including public services facilities, community facilities, and for accessibility improvement projects, indicating a continuing need throughout Snohomish County for these types of projects.

The Snohomish County Consortium 2025 Affordable Housing and Community Development Needs Survey results indicate public facilities were rated the third highest overall greatest need and support a wide variety of types of projects.

How were these needs determined?

A high priority need for public facilities has been identified through input from county, city, town and citizen representatives participating in community needs assessments and surveys, through staff analysis of historical application requests and award data, and through additional input received through the consultation and the citizen participation process.

Describe the jurisdiction's need for Public Improvements:

The Snohomish County Consortium includes cities and towns of different sizes located in both urban and rural areas. In Snohomish County there are many areas that qualify as low- to moderate-income areas on an area-wide benefit developed from U.S. Census data. Public improvements and infrastructure projects include streets, sidewalks, water/sewer projects, flood drain improvements, other flood mitigation projects, and accessibility improvements. Applications for funding are received for projects located in many different low- and moderate-income areas of the county, indicating a continued need for these types of projects.

Snohomish County consistently receives application requests for public improvements & infrastructure and public facilities that exceed the amount of funding available. In the 2025 Notice of Funding Opportunity, Snohomish County received 17 applications for Public Facilities & Infrastructure projects

requesting a total of \$9,716,362 for and estimated \$2,748,208 in 2025 funding available. Three projects were recommended for funding leaving 14 projects unfunded.

The Snohomish County Consortium 2025 Consolidated Plan-Affordable Housing and Community Development Needs Survey indicates that public improvements rate at medium to high overall greatest need. The survey indicated a variety of infrastructure needs, but the need for street and sidewalk improvements and ADA accessibility were rated the highest, with water/sewer, storm water, and flood drainage projects rated at medium-high.

How were these needs determined?

A high priority need for public improvements and infrastructure and public facilities has been identified through input from county, city, town and citizen representatives participating in community needs assessments and surveys, and through staff analysis of historical application requests and award data.

Describe the jurisdiction's need for Public Services:

Public services are needed for persons experiencing or at-risk of homelessness, and for other persons living with special needs. Identified needs include rental assistance, housing search and placement, housing stability services, emergency shelter, domestic violence services, children's services, services to assist people to access mainstream services (i.e., mental health or substance use treatment) and other services, in-home services, and life skills that support optimal self-sufficiency. In addition to housing-related needs, there is a need for mental health and substance abuse treatment services and for fair housing education and services.

In the results of the 2025 Affordable Housing and Community Development Needs Survey response to "thinking about your community rank the top three activities that have the greatest overall need" out of six options respondents chose "Continue or Increase Public Services (such as domestic violence services, homeless services, senior services, services for people with disabilities)" as the second highest need.

How were these needs determined?

The Needs Assessment and consultation and citizen participation conducted as part of the 2025-2029 Consolidated Planning process identified public services for persons living with special needs and those experiencing homelessness or at risk of homelessness as high needs. Services for persons living with special needs are identified needs as demonstrated through the Snohomish County Human Services Department 2019 Community Needs Assessment, the Snohomish County Consortium 2024 Affordable Housing and Community Development Needs Survey, and additional input received through the consultation and citizen participation process. The need for services for persons experiencing homelessness or at-risk of homelessness was also demonstrated through these avenues as well as through the annual Point-in-Time count, the Homeless Management Information System, and

coordinated entry system data. the Homeless data can be found in the Needs Assessment and Market Analysis sections of this plan. The need for fair housing education and counseling services was identified through the Snohomish County Consortium's 2019 Analysis of Impediments to Fair Housing Choice and will assist Snohomish County and Consortium members to affirmatively further fair housing. The amount of CDBG funds projected to be available and the eligible uses of these funds was also taken into consideration.

IV. Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Market Analysis is intended to provide a clear picture of the current environment in which the Snohomish County Consortium must administer the CDBG, HOME, and ESG programs over the course of the 2025-2029 Consolidated Plan. In conjunction with the Needs assessment and information gathered through consultations and the citizen participation process, it provides the basis for the Strategic Plan and the programs and projects to be administered in our community.

The Housing Needs Assessment includes seven sections: 1) General Characteristics of the Housing Market (number of housing units, cost of housing, and condition of housing), 2) Lead-Based Paint Hazards, 3) Public and Assisted Housing, 4) Assisted Housing, 5) Facilities and Services for Homeless Persons, 6) Special Needs Facilities and Services, and 7) Barriers to Affordable Housing; 8) Broadband Needs, and 9) Vulnerability to Increased Natural Hazards.

MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

Introduction

The 2016-2020 American Community Survey (ACS) estimates indicate that in Snohomish County there are 323,438 housing units, of which 307,643 (95.1%) were occupied and 15,795 (4.9%) were vacant. Of the total units, 69.7% were single family homes, 25.6% were multi-family buildings, and the remaining 4.7% consisted of other housing stock including mobile homes, boats, RVs, and vans.

The most common bedroom size for owner-occupied units are three-bedroom units at 84% of the total units. The most common bedroom size for renter-occupied units are two-bedroom units at 41%, one-bedroom units at 22%, and three-bedroom units at 33%.

All residential properties by number of units (add this data to IDIS)

Property Type	Number	%
1-unit detached structure	210,460	65.1%
1-unit, attached structure	14,789	4.6%
2-4 units	18,126	5.6%
5-19 units	32,186	10.0%
20 or more units	32,223	10.0%
Mobile Home, boat, RV, van, etc.	15,654	4.8%
Total	323,438	100%

Table 25 – Residential Properties by Unit Number

Alternate Data Source Name:
Census 2018-2022 ACS Estimates

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	874	0%	4,935	5%
1 bedroom	4,092	2%	21,116	22%
2 bedrooms	28,357	13%	39,171	41%
3 or more bedrooms	177,608	84%	31,490	33%
Total	210,931	100%	96,712	100%

Table 26 – Unit Size by Tenure

Data Source: 2018-2022 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Data from the National Housing Preservation Database (updated on February 10, 2025) ⁶ indicates that in Snohomish County there were 14,090 federally assisted homes with 12,076 (73%) supported by Low Income Housing Tax Credits, 993 (6%) supported with Section 515, 825 (5%) with Project Based Vouchers, 795 (5%) with Section 8 Project Based Rental Assistance (PBRA) , 793 (5%) with Section 521, 320 (2%) with HOME , 289 (2%) with Section 202, 196 (1%) with Public Housing, and 92 (1%) with Section 538. Note that some homes may be assisted with more than one subsidy. Assisted homes by target tenant include 44% for elderly and disabled, 32% mixed, 21% families, and 3% other.

Everett Housing Authority (EHA) reported they currently have 3,752 Housing Choice Vouchers, of which 1,361 have been designated as Project-Based Vouchers, and operates and maintains 2,179 affordable rental housing units, 1,071 of these are assisted with EHA Project-Based Vouchers.

The Housing Authority of Snohomish County (HASCO) reported they administer the HUD Section 8 Housing Choice Vouchers Program and provide rental assistance to approximately 3,800 very low-income and extremely low-income households annually, and 677 of these vouchers assist special needs populations. HASCO also operates and maintains other affordable rental housing units throughout Snohomish County.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The National Housing Preservation Database data indicates that in Snohomish County in the next 15 years 3,503 of the 14,090 federally assisted units are set to expire, and in the following 16 to 25 years, 5,223 are set to expire.

Units in affordable housing complexes may be lost when the required period of affordability has expired and the property owner chooses to rent the units at market rate. Other factors that can increase the number of affordable housing units being lost includes whether the property owner is a private owner or non-profit owner, the condition of the property, the level of subsidy compared with market rents, and demand for housing in the local market. In addition, due to required rent limits, project revenues are low and owners cannot afford major repairs from cash flow and are unable to qualify for loans to finance repairs because revenues are not sufficient to service debt. For potential homeowners, the supply of

⁶[Preservation Dashboard https://preservationdatabase.org/](https://preservationdatabase.org/)

affordable homes for sale has declined significantly due to rising costs and the lack of affordable single family homes on the market.

Renter occupied single family homes have increased significantly. Affordable single family homes are being purchased for use as rental housing, reducing the availability of affordable homes for sale. In 2023, the vacancy rate for rental housing was 4.3% and the vacancy rate for home sales was 2%.⁷

Does the availability of housing units meet the needs of the population?

There are not enough housing units in Snohomish County that are both affordable, and available to low- and moderate-income renters and owners in Snohomish County. The levels of cost-burden experienced by these households is much greater than the levels of cost-burden experienced in the population as a whole, with extremely low- and low-income renters and homeowners experiencing the most cost burden.

A moderately cost burdened renter household spends between 30 and 49.9% of their household income on gross rent (defined as monthly rent plus utility expenses). A severely cost burdened renter household spends 50% or more of their household income on gross rent.

Describe the need for specific types of housing:

There is a need for housing that is affordable among all populations and household types, with the highest need for smaller units for seniors and people with disabilities. Other populations include people with mental health illness and or substance use disorders, individuals and families experiencing homelessness, homeless unaccompanied youth and parenting youth up to age 24, singles, and households with children including single parent families.

From waiting lists for housing assistance, the Everett Housing Authority reported that the greatest need is for small units, with 44% needing a studio or one-bedroom unit, 23% needing a two-bedroom unit, 12% needing a three-bedroom unit, and 20% needing a four-bedroom or larger unit. From the Housing Authority of Snohomish County waiting lists for housing assistance, the greatest need is for small units, with 47.22% needing a studio or one-bedroom unit, 23.93% needing a two-bedroom unit, 11.54% needing a three-bedroom unit, and 4.42% needing a four-bedroom unit or larger.

⁷<https://www.huduser-Market at a Glance-01/24/2025>

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

This section of the market analysis reviews the cost of housing in Snohomish County, including median home value and median rent paid, range of rents paid, housing unit affordability table, a rent comparison table, and narrative analysis.

The analysis is based on information from the 2013-2017 ACS Five-year estimates, the 2018-2022 Five-year estimates, HUD Fair Market Rents, HOME program rents, and additional information received through the consultation and citizen participation processes.

The median home value is the value at which half of the homes are valued above, and half of the homes are valued below the average. From the base year of 2017, the median home value was \$338,400 and the most recent year based on 2022, was \$592,800, a 75% increase.

The median contract rent is the value at which half of the rents are above, and half the rents are below the average. Based on the 2017 ACS estimates, Snohomish County median contract rent was \$1,377, and from the 2022 ACS Estimates, the median contract rent was \$1,661, an increase of approximately 21%. In January 2025, Snohomish County home prices were up 6.7% compared to 2024, selling for a median price of \$747,000.⁸

Cost of Housing

	Base Year: 2017	Most Recent Year: 2022	% Change
Median Home Value	\$338,400	\$592,800	75%
Median Contract Rent	\$1,377	\$1,661	21%

Table 27 – Cost of Housing

Alternate Data

Source Name:

2013-2017

Census (Base

Year), 2018-2022

ACS (Most Recent

Year)

According to the ACS 2013-2017 (2017) five-year estimates in the “Cost of Housing” table above, the median rent in Snohomish County was \$1,377 and increased by 21% when compared to 2018-2022 ACS.

⁸ <https://www.redfin.com/county/2/WA/Snohomish-County/housing-market>

(2022) five-year estimate of \$1,661. The 2017 median home value was \$338,400 and increased by 75% to \$592,800 in 2022.

Rent Paid	Number	%
Less than \$500	3,943	4.19%
\$500-999	6,139	6.53%
\$1,000-1,499	17,393	18.50%
\$1,500-1,999	33,219	35.34%
\$2,000 or more	33,304	35.43%
Total	93,998	100.00%

Alternate Data Source Name:

Census 2018-2022 ACS

Data Source Comments:

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	7,369	No Data
50% HAMFI	24,484	7,358
80% HAMFI	54,751	20,127
100% HAMFI	No Data	44,800
Total	86,604	72,285

Table 28 – Housing Affordability

Data Source: 2018-2022 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	2,211	2,293	2,671	3,521	4,104
High HOME Rent	1,735	1,860	2,234	2,573	2,850
Low HOME Rent	1,317	1,411	1,695	1,959	2,186

Table 29 – Monthly Rent

Alternate Data Source Name:

2024 HUD FMR and HOME Rents

Data Source Comments:

Is there sufficient housing for households at all income levels?

There are not enough housing units in Snohomish County that are both affordable and available to very low and low-income income renters and owners, to meet the current need. The number of affordable housing units available has decreased substantially in the past several years. The 2023 Washington State Needs Assessment indicates that in Snohomish County there is a gap of available and affordable

units for households at or below 30% and 50% of median family income (MFI). Of the 24,055 households at 30% of MFI, there are 7,610 units available leaving a gap of 16,445 units. Of the 44,430 households at or below 50% of MFI, there are 28,025 affordable and available units, leaving a significant gap of 16,405 units. Approximately 98,272 households in Snohomish County are moderately or severely cost-burdened.⁹

The Housing Affordability Table above shows the number of units in Snohomish County affordable to renter and owner households at different income levels. The number of units available to rent at costs very low-income and lower Income households can afford, has declined substantially. For example, in the 2013-2017 ACS (2017) Five-Year Estimates 52.9% of all units rented for \$1,499 or less, compared to only 10.7% of the units in the 2018-2022 Five-Year Estimates (2022). On the contrary, between 2017 and 2022, the number of units renting for \$1,500 to over \$2,000, increased substantially from 13.4% of all units to 77.7% of all units.

How is affordability of housing likely to change considering changes to home values and/or rents?

According to the ACS 2019-2023 five-year estimates, the median rent in Snohomish County is \$1,866, an increase of 26% when compared to 2013-2017 ACS five-year estimate of \$1,377. The percentage of units in Snohomish County renting for less than \$500 decreased by 64%, from 10,066 units to 3,943 units. The percentage of units renting between \$500 and \$999 declined by 41.5%, a substantial decrease of 23,096 units. In comparison, the percentage of units renting between \$1,000 and \$1,499 declined by 92%, a decrease of 18,887 units. On the contrary, the percentage of units renting for \$1,500 to 1,999 increased by 178%, an increase of 18,887 units, and the percentage of units renting for \$2,000 or more increased by 117%, an increase of 28,437 units.

The “National Low-Income Housing Coalition – Out of Reach 2024 Report” indicates that in Snohomish County the income necessary to afford a 2-bedroom home at 2024 Fair Market Rent (FMR) of \$2,645, would require an hourly wage of \$50.87 / \$105,800 annually, or work require 3.1 full-time jobs at minimum wage.

The 2013 - 2017 ACS estimates indicated that 96,712 renter households, or 31% of total renter households earning an estimated average renter wage of \$23.70 per hour, could afford to pay no more than \$1,233 a month for rent. To afford a two-bedroom home at the mean renter wage would require 2.1 full time jobs to afford the rent.

⁹ [WA State Needs Assessment - Sno County](#)

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

The Area Monthly Rent table above has been updated with 2024 HUD data due to the substantial changes in the housing market over the last several years. The Fair Market Rents for all unit sizes are substantially higher than the high home rents. Using HOME funds to produce or preserve affordable rental housing does generally make the units assisted more affordable to low-income households, but some households, especially extremely low-income and low-income households, would still require additional rent subsidies to make the units affordable. Some of the HOME funded projects have involved successful partnerships between affordable housing developers and the local housing authorities, where project based vouchers were provided to ensure a certain number of units would be affordable to extremely low-income households, particularly homeless households. This points to the challenges associated with capitalizing housing projects sufficiently in order to serve extremely low-income households, and to ensure that rental housing is properly maintained and operated once placed in service.

In addition, while producing and preserving affordable rental housing with HOME dollars continues to be an important long-term strategy to increase and maintain this type of housing stock and to leverage other state and federal funds to assist with these local efforts, combining this strategy with the utilization of a portion of HOME funds to provide limited-term tenant-based rental assistance for extremely low-income households, including homeless and at risk persons, is an effective way to provide immediate housing assistance to the most vulnerable and cost-burdened households who are priced out of the housing market.

MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

Introduction

The following section outlines four selected housing conditions as defined by the Census. These conditions are generally considered identifiers of substandard housing, although the last two conditions on the list relate to the household and not the housing unit. The Census defines the four selected conditions as:

- Lacking complete plumbing facilities,
- Lacking complete kitchen facilities,
- More than one person per room, and
- Housing costs greater than 30% of household income.

Describe the jurisdiction's definition for "substandard condition" and "substandard condition but suitable for rehabilitation":

For purposes of the federal anti-displacement and relocation regulations, the following definitions related to housing unit conditions apply for the Snohomish County Consortium:

Standard Condition is defined as a dwelling unit that meets or exceeds HUD's Housing Quality Standards (HQS) and is rated "Average Condition" or better in accordance with the Snohomish County Assessor's Office Residential Appraisal and Assessment Practices (RAAP) rating system.

Substandard Condition But Suitable For Rehabilitation is defined as a dwelling unit that does not meet one or more of the HQS and is rated "Poor Condition" or better in the RAAP.

Substandard Condition Not Suitable For Rehabilitation is defined as a dwelling unit that has been vacant for at least three months, does not meet one or more of the HQS, and is rated "Very Poor Condition" in the RAAP.

The definition of "Very Poor Condition" in the RAAP is as follows:

"Effective age is near the end of the scale regardless of the actual chronological age. Abuse, limited value in-use, approaching abandonment, reuse is not feasible, change in occupancy is imminent.

- Improvement has reached the end of its economic life. (Not Rentable.)
- Major Reconstruction to reuse structure is deemed not economically justified or practicable.
- Uninhabitable - limited potential for rehabilitation.
- It is likely the improvement will not be occupied or even exist six (6) years from inspection.
- Highest and Best used *should* be considered."

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	52,367	25%	45,551	47%
With two selected Conditions	1,367	1%	4,187	4%
With three selected Conditions	81	0%	140	0%
With four selected Conditions	25	0%	8	0%
No selected Conditions	157,091	74%	46,826	48%
Total	210,931	100%	96,712	100%

Table 30 - Condition of Units

Alternate Data Source Name:

2018-2022 ACS

Data Source Comments:

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	58,334	29%	22,394	23%
1980-1999	70,659	35%	38,615	40%
1950-1979	59,997	30%	27,206	29%
Before 1950	14,197	7%	7,269	8%
Total	203,187	101%	95,484	100%

Table 31 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead Based Paint	Owner-Occupied	Occupied	Renter-Occupied	Occupied
	Number	%	Number	%
Total Number of Units Built before 1980	74,194	37%	34,475	36%
Housing Units built before 1980 with children present	35,223	17%	22,714	24%

Table 32 - Risk of Lead Based Paint Hazard

Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	Not available	0	0
Abandoned Vacant Units	Not available	0	0
REO Properties	Not available	0	0
Abandoned REO Properties	Not available	0	0

Table 33 - Vacant Units

Data Source:

According to the 2016-2020 American Community Survey data, 15,795 (6%) of all housing units in Snohomish county were vacant. No data is currently available on the number of these units that were abandoned or how many are suitable and not suitable for rehabilitation.

Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.

There continues to be a need for the rehabilitation of both owner and rental housing. Age is an important determination in the condition of housing stock. Data in the "Year Unit Built" table above shows that 30% (59,997) of owner-occupied units and 29% (2,706) of the renter-occupied units were built in 1979 or earlier, with 7% (14,197) and 8% (7,269) of these units built before 1950. In general, housing stock of this age demonstrates a range of need from minor home repair programs to rehabilitation of homeowner low- and moderate-income housing programs. Low and moderate-income households, a large percentage of persons over the age of 62, live in homes that have significant need for rehabilitation. Preserving and maintain affordable housing in Snohomish County is a high priority especially for seniors, elderly and persons with special needs, who are more likely to have limited or fixed incomes and unable to afford housing rehabilitation or higher rents in newer housing unit. Rental housing has a significant number of units (59,997) built prior to 1979 and are more likely to be in need of more rehabilitation than units built later.

Survey results from the 2025 Consolidated Plan Housing and Community Development Survey identified the top three greatest overall needs as:

- Increase or improve affordable housing options 29%,
- Continue or increase public services 28%, and
- Increase or improve facilities providing community services 21%.

The top affordable housing needs identified include provide housing for homeless persons (27%), create or maintain rental housing 23%, and provide housing for persons with special needs (elderly, disabled) at 20%. When asked the type of housing stock most in need of preservation, 71.8 % of respondents identified single family housing, 64.1% identified multi-family housing, and 15.4% of identified mobile homes.

Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405

The age of housing is a factor commonly used to estimate the risk of lead-based paint hazards in the home. Although lead-based paint was banned for use in residential structures after 1978, many older housing units built before 1978 may still contain lead hazards. Units built before 1950 pose the greatest

risk as they generally contain paint with a higher lead content and have had more time to deteriorate; these units are generally located in older town centers. Exposure to lead in the home from paint, chips, and dust can pose serious health hazards, particularly to younger children.

The Risk of Lead Based Paint Hazard in the chart above shows that 37% (74,194) of owner-occupied units in Snohomish County were built before 1980, with children present in 17% of these units (35,223), and 36% (34,475) of renter-occupied units in Snohomish County were built before 1980, with children present in 24% (22,714) of these units.

The Washington State Department of Health (DOH) maintains the results of blood level tests performed on children under 6 years of age in Washington State. Based on 2022 data, in Snohomish County there were 60,819 children under the age of 6 and 2,588 or 4.6% of them were tested.¹⁰

Testing rates need to increase so that children who have lead in their blood are identified and protected from further exposure. Washington is at the very bottom and Snohomish County is even lower than the state ratio for testing. Identifying cases is crucial to protecting children by removing their exposure to the source of lead.¹¹

¹⁰ [Information by Location | Washington Tracking Network \(WTN\)](#)

¹¹ [Snohomish County Health Department](#)

MA-25 Public And Assisted Housing - 91.410, 91.210(b)

Introduction

This section provides a summary of the needs of public housing in Snohomish County including identification of public housing developments in the jurisdiction, the number and physical condition of public housing units, the restoration and revitalization needs of public housing units, and public housing agency strategy for improving the living environment of low- and moderate-income families residing in public housing. As discussed earlier, Snohomish County, the City of Everett, and the City of Marysville are served by two public housing agencies, the Housing Authority of Snohomish County (HASCO) and the Everett Housing Authority (EHA).

The Public Housing section provides a summary of the needs of Everett Housing Authority (EHA) public housing residents including information on total public housing units and Housing Authority of Snohomish County (HASCO) and Everett vouchers. Information in the tables below in this section are updated with current information provided by EHA and HASCO. Additional information for this section was provided through consultation with HASCO and EHA staff and their respective five-year Public Housing Agency Plans.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	26		6,708	1,351	4,672	262	45	378
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 34 – Total Number of Units by Program Type

Alternate Data Source Name:
HASCO and EHA Voucher Statistics
Data Source Comments:

Describe the supply of public housing developments:

Not applicable. EHA and HASCO no longer own public housing units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

Not applicable. EHA and HASCO no longer own public housing units.

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

NA

Public Housing Condition

Public Housing Development	Average Inspection Score
NA	

Table 35 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

NA

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

NA

MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

Introduction

This section describes the homeless shelter and housing system and complimentary services that are available to persons experiencing or at-risk of homelessness.

The following chart includes Rapid Re-Housing and Other Permanent Housing, both are permanent housing interventions targeted to individuals and families experiencing homelessness.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year-Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	202	0	8	1,664	0
Households with Only Adults	311	0	3	1,261	0
Chronically Homeless Households	0	0	0	977	0
Veterans	2	0	0	506	0
Unaccompanied Youth	12	0	10	0	0

Table 36 - Facilities Targeted to Homeless Persons

Alternate Data Source Name:
Homeless Management Information Systems
Data Source Comments:

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Homeless housing provider staff and coordinated entry resource navigators administer Fenn-Jorstad Self-Sufficiency Matrix® to all homeless and formerly homeless households to determine what services might be appropriate to address the current or recent housing crisis. Through administration of this tool, every household served receives a score ranging from 'in crisis' to 'safe' in sixteen life domains, including financial, legal, employment, mental health, substance abuse, and physical health. These life domain scores provide helping professionals and navigators with a basis to identify areas with the household in which services may be desired and to determine what specific programs might be appropriate to meet the household's acuity of need within that domain. Individuals and families are then assisted with accessing appropriate and available resources and programs.

The type of services that individuals choose to access will depend on their own goals and plan for housing stability. Many individuals choose to work with mainstream employment providers funded through the federal Workforce system to receive assistance developing interviewing skills, conducting job search, and creating targeted resumes. However, the Workforce system will not meet every household's needs: some individuals need more intensive or longer-term services in order to find and maintain employment and so choose to engage in life skills, adult basic education or basic skills training programs to build the foundation needed for successful participation in the Workforce system.

Homeless housing provider staff and resource navigators also have access to Employment Readiness Support Services Program (ERSSP) through referrals coordinated by Snohomish County. Households referred to ERSSP are provided a choice between one of several agencies providing these employment support services. The agencies support participants by offering assessment of employment needs, assistance with employment documents, career planning, vocational education, job search assistance, resume and application development, interview practice and assistance in outreach to employers. The employment agencies also have access to flexible funding to assist with costs associated with barriers to employment.

Navigators and provider staff assist those who are likely eligible to sign up for assistance through web-based portals or in persons where available. There are specific organizations that specialize in helping sign up for healthcare or DSHS benefits. The Veteran's group helps veterans sign up for VA benefits.

Housing provider staff and navigators also assist individuals with accessing health care, mental health and substance abuse services available through a range of federal and local programs. Uninsured or underinsured individuals are assisted with applying for Medicaid and those for whom access to healthcare is a goal related to housing stability, helping professionals and navigators provide assistance with choosing primary care providers and navigating the healthcare system. Individuals and families also access a range of mental health and substance abuse services including assessment, counseling, inpatient and outpatient treatment, and support groups.

Civil legal services, financial life skills and credit counseling programs are also vital to assisting households achieve positive housing outcomes: manage finances, increase income through debt reduction and improve employment outcomes by addressing wage garnishments. Often times, households are able to resolve or lessen their housing crisis through connections with all of these mainstream resources, which can enable them to stabilize without entering the homeless housing system or lessen the need so that they can be assisted through short, less costly, housing interventions.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The services listed on the table are available to persons who are experiencing or at-risk of homelessness, and in many instances the CoC has developed tailored services pathways that are targeted to those individuals and families. The services support households to access and stabilize in housing and meet the identified needs of each individual.

Chronically homeless individuals and families: A coordinated Outreach and Engagement Team, contacts and engages chronically homeless persons and others staying in places not meant for human habitation to connect them with housing, mental health or chemical dependency services, veteran's services, employment services, help signing up for coverage under ACA and other mainstream benefits or other needed assistance. The services support persons in accessing housing, stabilizing in housing and optimizing self-sufficiency. (Clare's Place, Carnegie Service Center, Diversion Center...)

Families with Children: Families are assisted by Navigators or other agency staff to access homeless or homeless prevention assistance. Families are assisted based upon assessment of their needs from a platform that is client/family centered and driven. Services that support families to access housing, prevent homelessness and increase self-sufficiency include financial assistance, mental health counseling, chemical dependency treatment, education and employment pathways, life skills, childcare, assistance to sign up for mainstream benefits, health care and other services. These services are critical for the family to increase income, increase resiliency, and move forward in their lives.

Veterans and their families: The CoC's Veterans Homelessness Committee is a partnership consisting of non-profit agencies, PHA, Veteran's Administration, WorkSource, County Veteran's Assistance, and others CoC stakeholders. This group assists veterans to sign up for VA benefits, other mainstream benefits and health care, provides access to employment services, assist with access to mental health and chemical dependency services, transportation for appointments, financial assistance and other services. The group also ensures veterans and their families are connected to other CoC housing and services, such as legal assistance. This partnership streamlines the process for veterans to access housing and receive services that support increased stability, safety, income, and the services are tailored to each veteran and their family based upon their needs.

Unaccompanied Youth: Cocoon House provides the primary services, shelter and transitional housing for homeless unaccompanied youth and youth homeless prevention services for youth under 18 years old. Several agencies provide services, shelter and housing options for youth 18-24 years old. Services include mental health and substance abuse services, transportation assistance, outreach and engagement, pregnant and parenting housing and services, life skills, connection to education and employment, homeless prevention counseling and groups for youth and their families, and other services. The services support youth to stay with or reunite with family or transition to other safe and stable housing. The services also help youth reengage in school, attend secondary education, and receive employment supports. Life skills help youth prepare for adulthood and build their resiliency toward increased self-sufficiency and success.

MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)

Introduction

The Special Needs Facilities and Services section provides summary information on supportive housing facilities and programs in the community for persons with special needs. For additional information on supportive housing needs for persons with special needs see Section NA-45.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Elderly and frail elderly persons: Housing with supportive services in the community for this population includes senior apartments with service coordinators for those needing assistance with connecting to services in the community, assisted living facilities, congregate or group housing, nursing homes (skilled nursing facilities), programs providing chore services, in-home care, meals, transportation, adult day services, senior information and assistance line, assistance to care givers, and minor home repair and home rehabilitation programs.

Persons with disabilities (physical and cognitive): Housing with supportive services in the community for this population varies. It includes other supportive housing programs in the community for low-income and homeless persons that serve persons with disabilities. Housing for people with developmental disabilities includes congregate living in single family homes, small multi-family, group homes, and residing at home with parents or family members. Many people with developmental disabilities receive supportive services that help with personal care or daily living skills through the Washington State DSHS Department of Development Disabilities or through Medicaid.

Persons with mental illness: Snohomish County has several facilities that provide treatment and residential services to adults with persistent mental illness. The Crisis Triage Facility, currently undergoing redevelopment as part of the Broadway Campus Redevelopment project in Everett, is part of a broader effort to enhance behavioral health services. The new facility will provide a safe, recovery-oriented environment for individuals in crisis, with expanded capacity and a multidisciplinary team to address diverse needs. It aims to reduce reliance on emergency rooms and jails, offering a more appropriate and supportive alternative for those in crisis.

Persons with substance use disorders: Snohomish County offers several services for individuals and families dealing with substance use disorders including detox, outpatient and in-patient treatment, including support for at-risk families and individuals with challenges related to substance use and mental health.

A community-based, public health program provides critical services to people who use drugs and focuses on harm reduction and offers substance use prevention and intervention services. They provide support without judgment, meeting individuals where they are.

Persons living with HIV/AIDS: While based in Seattle, the Lifelong AIDS Alliance organization serves the broader region, including Snohomish County and provides housing and supportive services for persons living with HIV/AIDS and includes medical assistance, connections and referrals to mental health services, substance abuse and chemical dependency treatment services, housing assistance programs.

Victims of Domestic Violence: The housing and supportive service needs of victims of domestic violence include crises intervention, children's programs, legal advocacy, support groups, emergency shelter, community education and advocacy, supportive housing and permanent affordable housing. These housing and services are offered through "Domestic Violence Services of Snohomish County."¹² In addition, "Providence Intervention Center for Assault and Abuse" provides advocacy, forensic nurses, nurse practitioners, therapists, and social workers offer services to those impacted by sexual, physical, and/or relationship violence.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Snohomish County has several programs aiming to assist persons returning from mental and physical health institutions to access housing resources.

Compass Health operates three Residential Treatment Facilities that serve adults age 18 and over diagnosed with severe and persistent psychiatric disorders. The program focuses on helping residents reach increasing levels of recovery in order to successfully transition back into the community. Priority placement for residential treatment services is given to individuals discharging from psychiatric inpatient units. Individuals currently living independently but struggling to maintain stability in the community may be referred by their treatment team. Typical length of stay is between 6-18 months, while individuals focus on developing the skills necessary to live independently in the community.

Compass Health offers a range of housing services tailored to individuals transitioning from mental health treatment facilities. Their programs focus on providing safe and affordable housing to support recovery and stability and include permanent supportive housing, affordable housing assistance, and short-term housing assistance through an emergency motel voucher program. Access to these services is provided through the Snohomish County Coordination Entry system, by visiting the Carnegie Resource Center in Everett, or by calling 2-1-1.

¹² <https://dvs-snoco.org/>

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

m (AP-20, Goal 5; AP-35 Project 9)

The Snohomish County Consortium plans to undertake the following activities during Year 1 (2025 Program Year) of the 2025-2029 Consolidated Plan with CDBG and HOME funds to address the housing and supportive services needs of persons who are not homeless but have other special needs. For information about each project listed below please click [AP-35 - Projects](#).

- Homage Senior Services – Minor Home Repair Program (AP-35, Project #12)
- Mercy Housing Northwest – Senior Housing Support Services (AP-35, Project #7).
- Senior Services of Snohomish County DBS Homage – Food and Nutrition Services (AP-35, Project #6).
- Housing Authority of Snohomish County (HASCO) – Manufactured Home Community/Alpine Ridge Utility Improvement (AP-35, Project #15).

MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)

Describe any negative effects of public policies on affordable housing and residential investment

Describe the specific efforts to be undertaken to reduce the barriers to affordable housing.

In the 2025-2029 Affordable Housing and Community Development Needs Survey, responders were asked to list strategies local governments could use to help overcome barriers to affordable housing. Common themes identified were:

- Provide education to community members on affordable housing benefits and myths
 - Increase acquisition and rehabilitation of existing stock
 - Build up and allow for increased accessory dwelling units
 - Decrease the cost of rent/consider rent control
 - Adjust/relax zoning restrictions
 - Simplify housing development applications and create more tax incentives
- Use government-owned property for affordable housing.

Snohomish County has significantly reduced barriers to affordable housing over the past several years by streamlining the permitting process, amending [Ordinance 22-006](#) relating to the Growth Management Act – revising Accessory Dwelling unit regulations to allow Detached Accessory Dwelling Units (DADUs) on substandard lots and changes distance requirements from the main structure, creating more flexibility for the placement of DADUs in rural areas, collection of a 0.1% tax to support new units of affordable housing, and approved regulations that address the housing affordability crisis by increasing the supply of housing and reducing barriers to development.

In August 2024, Snohomish County Council voted to adopt four pieces of legislation to address housing affordability and made adjustments to county code in an effort to increase the available supply of market-rate housing and drive down costs, including: [Ordinance 24-058](#) amends county regulations related to lot size averaging, reducing minimum lot widths in urban zones and simplifying open space requirements; [Ordinance 24-059](#) introduces flexibility within parking regulations, allowing for more efficient single-family developments; [Ordinance 24-060](#) reduces minimum lot size requirements in low-density multiple residential zones, enabling more efficient development; and [Ordinance 24-061](#) creates more flexibility for the subdivision of duplexes and creates consistency within the regulations with other similar housing types.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

Snohomish County is one of four counties in the Puget Sound Economic Development Region, including King, Kitsap, Pierce, and Snohomish Counties. The region is home to key export focused industries including Aerospace, Information & Communication Technology, Maritime, Military & Defense, Life Sciences & Global Health, Clean Technology, Tourism, Transportation & Logistics, and business services. Also looks beyond these large key industries, identifying the industry clusters that 4.0 highlight strengths in each of the region's four counties. Snohomish County's top five employers include:

- The Boeing Company,
- Providence regional Medical Center,
- Edmonds School District,
- Tulalip Tribes, and
- Washington State Government.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,005	501	1	0	0
Arts, Entertainment, Accommodations	13,176	14,389	11	14	3
Construction	10,091	9,107	9	9	0
Education and Health Care Services	17,649	14,208	15	14	-1
Finance, Insurance, and Real Estate	6,822	8,680	6	8	3
Information	5,931	2,235	5	2	-3
Manufacturing	16,198	12,845	14	12	-1
Other Services	4,288	3,386	4	3	0
Professional, Scientific, Management Services	11,682	9,503	10	9	-1
Public Administration	0	0	0	0	0
Retail Trade	15,974	18,200	14	18	4
Transportation and Warehousing	2,954	1,374	3	1	-1
Wholesale Trade	5,248	3,785	4	4	-1
Total	111,018	98,213	--	--	--

Table 37 - Business Activity

Data Source: 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Total Population in the Civilian Labor Force	448,066
Civilian Employed Population 16 years and over	425,167
Unemployment Rate	4.38
Unemployment Rate for Ages 16-24	5.81
Unemployment Rate for Ages 25-65	3.0

Table 38 - Labor Force

Alternate Data Source Name:

Census 2018-2012 ACS Estimates

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	78,143
Farming, fisheries and forestry occupations	1,654
Service	63,861
Sales and office	82,822
Construction, extraction, maintenance and repair	25,774
Production, transportation and material moving	49,438

Table 39 – Occupations by Sector

Data Source: 2018-2022 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	174,364	50%
30-59 Minutes	127,398	36%
60 or More Minutes	50,429	14%
Total	352,191	100%

Table 40 - Travel Time

Alternate Data Source Name:

Census 2018-2022 ACS Estimates

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	20,536	1,139	10,906
High school graduate (includes equivalency)	74,330	3,700	25,363
Some college or Associate's degree	120,315	5,097	32,049
Bachelor's degree or higher	141,364	3,950	22,664

Table 41 - Educational Attainment by Employment Status

Alternate Data Source Name:

Census 2018-2022 ACS Estimates

Data Source Comments:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	726	1,936	3,380	6,829	3,821
9th to 12th grade, no diploma	8,134	5,183	5,796	9,462	5,461
High school graduate, GED, or alternative	23,689	28,104	23,951	51,830	29,000
Some college, no degree	17,586	27,654	26,479	52,921	31,147
Associate degree	5,708	12,510	13,127	25,635	10,873
Bachelor's degree	7,168	33,443	33,217	46,456	22,760
Graduate or professional degree	465	13,252	18,172	24,137	13,802

Table 42 - Educational Attainment by Age

Alternate Data Source Name:

Census 2018-2022 ACS Estimates

Data Source Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$ 42,336
High school graduate (includes equivalency)	\$ 48,498
Some college or associate degree	\$ 56,839
Bachelor's degree	\$ 81,226
Graduate or professional degree	\$ 107,689

Table 43 – Median Earnings in the Past 12 Months

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Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The 2016-2020 ACS data in the business activity table above indicates that education and health care services, manufacturing, and retail trade are the major employment sectors in Snohomish County, with arts, entertainment, and accommodations second, and professional, scientific, management Services occupations third.

Over half of all jobs in Snohomish County are concentrated in Manufacturing, Government, Healthcare and Social Assistance, and Retail Trade sectors. The largest private sector employers as of 2022 were concentrated in these sectors and included regional employers such as The Boeing Company (29,630 employees); Providence Swedish (7,350 employees); The Everett Clinic (2,639 employees); Albertson's Companies (2,719 employees); and Walmart (2,100 employees). The military was the largest public sector employer, which includes Naval Station Everett which employed 4,300 individuals. Tulalip Tribes (3,659 employees), Washington State Government, including colleges (3,261 employees), and Snohomish County Government (2,877 employees) are also major public sector employers.

The not seasonally adjusted unemployment rate was 4.2% in January 2025, up from 3.6% in December and down from 4.5% in December 2024. The labor force was 470, 816 workers, expanding by 8,741 over the year¹³.

Describe the workforce and infrastructure needs of the business community:

Snohomish County's business community requires a highly-skilled workforce with a strong foundation in science, technology, engineering, and mathematics (STEM). Supporting efforts to address the workforce gaps in STEM occupations in the K-20 education system is a key economic development priority.

The Snohomish STEM Network is a collaborative initiative bringing together a diverse group of leaders dedicated to advancing STEM education and opportunities in Snohomish County. According to Washington STEM,¹⁴ Across Washington, access to high-quality early learning is linked to development and achievement when young students arrive in K-12 schools. In Snohomish County only 68% of children entering kindergarten are math-ready, in comparison to 66% of children statewide.¹⁵ Estimated number

¹³ [Snohomish County profile | Employment Security Department](#)

¹⁴ <https://washingtonstem.org/>

¹⁵ [STEM by the Numbers Dashboard - Washington STEM](#)

of Child Care and Early Learning Need for Snohomish County is 9,863. There are currently 1,701 subsidies 528 private, which results in 22.6% of the need covered leaving a gap of 77.4%.¹⁶

The lack of affordable housing options and increases in population growth have increased the cost of housing substantially in Snohomish County over the past several years. Census ACS data indicates that 33% of all households in Snohomish County pay 30% or more of their income for housing costs. More affordable housing options, for both homebuyers and renters, are needed to support a local workforce. Affordable housing near employment centers and better transportation options are also needed.

¹⁶ [Child Care and Early Learning Need and Supply Data](#)

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Snohomish County Executive Dave Somers's top priority is to ensure the economic prosperity of our region. The County Executive established sector leads in areas of historic leadership and emerging opportunities. This new structure engages with industry leaders to collaborate on policies and strategies to advance targeted sectors of opportunity for the county. The primary focus of the sector team is on driving economic growth and creating jobs. The sectors focus strategically on the development and implementation of strategies and action plans to promote growth in key industry sectors. One important cross-industry and multi-sector priority is manufacturing, since this is an area of particular promise for Snohomish County.¹⁷

The Economic Development Initiative strengthens and grows our region through industry sector strategies focused on:

- Facilitating collaborative public private partnerships
- Promoting a thriving economic climate
- Encouraging the workforce to meet industry needs

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

As noted above, there is a gap between the skills of the workforce, particularly those workers between the ages of 16 and 24, and employment opportunities offering living wages in Snohomish County, resulting in an unemployment rate of 12% percent in this group, which is a decrease of 8% since 2011.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Workforce training initiatives support the 2025-2029 Consolidated Plan by providing avenues to opportunity and resources for all residents, including low- and moderate income persons, youth, persons experiencing homelessness or at risk of homelessness, and for persons with special needs, by providing skills, training, access, and support needed for success in the workplace, and in turn, provide a pipeline of highly-skilled and trained workforce to meet demand.

¹⁷ <https://www.snohomishcountywa.gov/3642/Economic-Development-Initiative>

The following workforce training initiatives are available in Snohomish County:

Workforce Snohomish, the local workforce investment board, and every K-20 public educational institution in Snohomish County are collaborating on workforce training initiatives to address this skills gap and create economic opportunity for all Snohomish County residents.

The Workforce Training and Education Coordinating Board is a partnership of labor, business and government dedicated to helping Washington State residents obtain and succeed in family-wage jobs, while meeting employers' needs for skilled workers. It oversees a workforce development system that includes 18 education and training programs.

Workforce Development Council Snohomish County supports local workforce development, including administering the national Workforce Investment Act and other initiatives, to increase the competitiveness of Snohomish County workers and businesses.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

Yes, Snohomish County participates in the Puget Sound Regional Council – Regional Economic Strategy.¹⁸

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

The Puget Sound Regional Council (PSRC) works to ensure a future for the region through planning for growth, transportation and economic development and is leading implementation of the regional economic strategy. The 2025 priority areas of focus for sustaining the region's economy¹⁹ that may be coordinated with the 2025-2029 Consolidated Plan include:

- Strengthen workforce development efforts to meet the needs of regional workers and employers.
- Expand housing and childcare options in the region to meet the needs of residents and workers.
- Continue to invest in regional infrastructure that supports economic development, including broadband.
- Opportunity Zones, created by the 2017 Tax Cut and Jobs Act, established the federal opportunity zones program, a community reinvestment tool designed to stimulate private investment in designated, low-income census tracts nationwide. A number of Opportunity Zones exist within

¹⁸ [Regional-Economic-Strategy](#)

¹⁹ [2025 Economic Development Priorities](#)

Snohomish County to meet the needs of a broad range of industries including Arlington Airport & Marysville North, Town of Darrington, Everett, Lynnwood City Center, and Paine Field.²⁰

²⁰ [Opportunity Zones in Snohomish County, WA](#)

MA-50 Needs and Market Analysis Discussion

**Are there areas where households with multiple housing problems are concentrated?
(include a definition of "concentration")**

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

As defined by HUD, Racially/Ethnically Concentrated Areas of Poverty (R/ECAPs) as having a non-white population of 50% or more, where 40% or more of the population is at or below the poverty line (or the poverty rate is greater than 3 times the average poverty rate in the area). are areas where there is extreme poverty and where the majority of the population is non-white. Snohomish County does not have census tracts that have non-white populations of 50% or more.

The 2019 Snohomish County Consortium - Analysis of Impediments to Fair Housing Choice (2019 AI), completed in November 2019, reviewed racial/ethnic and low-income concentrations for the Snohomish County Consortium area, outside the City of Everett. For information on areas of concentration and definitions of concentration for the City of Everett see Section MA-50 of the Participation Grantee CDBG Template.

As reported in the 2019 AI, there are no areas in the Snohomish County Consortium where a non-white race meets the definition of a disproportionate concentration. However, combining all non-white races with Hispanic ethnicity, so that "racial and ethnic minority" is defined as a single race, where more than 50 percent of a census tract or block group is made of minority populations (all minority groups together), Lynwood has numerous block groups that meet this definition, Mukilteo has one, and Bothell has two block groups meeting this definition.

Race and Ethnicity Dissimilarity Index is a measure of community level segregation with a range of 0 to 100, with zero representing perfect integration between racial groups and 100 representing perfect segregation. Less than 40 is deemed low segregation and 55 is deemed high segregation. Snohomish County has low dissimilarity indexes for white to non-white, Hispanic, and Asian and Pacific Islander (ranging 29.97 – 39.38), and the highest between white and black at 41.99.

People of color in the Consortium are more concentrated in the southwest area of the County, white populations are inversely lowest in these areas. 10% of the overall County population is Hispanic, with the largest percentage of the County's Hispanic populations located in smaller towns, census designated places, and unincorporated Snohomish County with the exception of the City of Everett, where the second largest percentage of Hispanic populations are located.

Black/African American, Asian, and Native Hawaii and Pacific Islanders have higher population percentages in Mountlake Terrace and Lynnwood, than their percentages in the overall Consortium

population. Alaska Native/American Indians have higher population percentages in Gold Bar, Stanwood and Arlington areas, and Asians have higher population percentages in Mill Creek and Mukilteo.

What are the characteristics of the market in these areas/neighborhoods?

The Snohomish County Consortium contains both rural and urban areas, and the areas of concentrations noted above are located in the urban southwest region of Snohomish County. The southwest region contains a mix of single family and multi-family housing units, with a greater percentage of multi-family units and renter households located in the cities versus the unincorporated areas. About 68.4% of the households in the region are families, 33.1% of which have children living at home. Neighborhoods with higher median incomes in the southwest region are generally located on the west and east sides, while neighborhoods with more low-to-moderate median incomes are generally located more centrally along the major transportation corridors of I-5 and Highway 99.

While rental housing in the southwest region is generally more affordable to moderate-income households with incomes above 60% of the area median income, units are generally not affordable to extremely low-income households and there is limited affordability for low-income households, similar to market characteristics in Snohomish County as a whole. Affordable homeownership options in the southwest area are limited for moderate-income households and very limited for extremely low-income and low-income households, similar to market characteristics in Snohomish County as a whole.

Affordable housing options are provided in the southwest region through assisted rental units as well as through participants in the Section 8 programs administered by the local housing authorities who use their rental vouchers in this region. In addition, the 2019 Snohomish County Consortium Analysis of Impediments to Fair Housing Choice reviewed locations of assisted rental units and found that Voucher holders are concentrated in Lynnwood, Mountlake Terrace, Mill Creek, southern Everett, but also showed affordable housing opportunities located in most areas of Snohomish County.

Are there any community assets in these areas/neighborhoods?

Many community assets exist in or near these areas/neighborhoods including public schools, libraries, a WorkSource Center, commercial businesses, health care facilities including facilities serving low-income persons, recreational facilities some of which provide assistance for low-income persons, parks, senior centers, grocery stores, a community college, and other amenities and services. The areas are located near I-5 and Highway 99 which provides access to public transit that travels along these corridors. The public transit provides connective links to King County to the south and to Everett to the north, both of which are major employment centers, and provides access to another WorkSource Center and another community college in Everett which also partners with universities to provide four-year degrees.

Are there other strategic opportunities in any of these areas?

Opportunity exists for local governments in these communities, and agencies and organizations serving these communities, to apply for funding for projects through the Snohomish County Consortium's CDBG, HOME, ESG programs, and state and local funding.

Some of the concentrated areas include block groups that are considered predominately low- and moderate-income under the CDBG program and may be eligible for public facility and infrastructure improvements such as parks, streets, and sidewalks. Improvements to existing or new community facilities may also be eligible under this program if at least 51% of the people served are low- and moderate-income. It is also anticipated that the rental housing, rental assistance, homeowner home repair, and homebuyer assistance goals for the Snohomish County Consortium's CDBG, HOME, and ESG programs will help to maintain and increase affordable housing options for residents county-wide, including residents of these areas.

MA-60 Broadband Need of Housing - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

The need for broadband wiring and connection for households in Snohomish County, is critical for removing barriers to for accessing Lack of broadband access risks the health and welfare of residents, especially those in rural areas and underserved areas and need access to vital services including telemedicine, schools, and employment opportunities. The high cost of internet services and lack of access to computers makes it more difficult for the lower income households. In Snohomish County 97.3% of households have a computer and 93.8 % had a broadband internet subscription (ACS 2023 5-Year Estimates).

The COVID Pandemic and the SR530 Mudslide demonstrated significant need to for broadband access for all residents of Snohomish County, especially in rural and underserved areas. Access to vital services including telemedicine, schools, access to employment opportunities, contact with family members, schools, access to employment opportunities and assist public safety and emergency management and community connectiveness.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

The Broadband Internet Service Access law (Second Substitute Senate Bill 5511) established minimum requirements for broadband internet access for businesses and residences throughout Washington State. By 2028, all Washington businesses and residences will have access to at least one service provider with upload and download speeds of at least 150 megabits per second. This legislation also created the Governor’s Statewide Broadband Office and a grant and loan program administered by the Public Works Board for financing broadband infrastructure projects.

Snohomish County has been actively working on several broadband initiatives to improve access and digital equity including the SR-530 Corridor Expansion, Digital Equity Investments, and Broadband Action Team (BAT). More information on these initiatives is located [Here](#).

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Snohomish County has been a leader in working to address climate change and has engaged in the following planning strategies and efforts to address greenhouse gas emissions and the expected impacts that climate change will have on people, property, the economy, and ecosystems:

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Snohomish County's Hazard Mitigation Plan (HMP) identifies and prioritizes actions to reduce or alleviate risks from natural hazards, which reduces loss of life, personal injury, and property damage to residents and businesses within the county. Hazards of concern in Snohomish County include earthquakes, epidemics, Hazardous Materials – Train Accident Weather Events – Windstorm, Winter Storm, and Drought, flooding, dam failure, wildfires, cybersecurity threats, landslides and mudslides, and volcanos.

Some populations experience greater risk from hazard events because of decreased resources and/or physical abilities. Research has shown that people living near or below the poverty line, the elderly (especially older single men), the disabled, women, children, ethnic minorities, and renters all experience, to some degree, more severe effects from disasters than the general population. There is a need for increased awareness of and sensitivity to these demographic differences.

Indicators of vulnerability, such as disability, age, poverty, and minority race and ethnicity, often overlap spatially, and often in the geographically most vulnerable locations. Detailed spatial analysis to locate areas with higher concentrations of vulnerable community members (e.g., people with low incomes, people who are elderly or with disabilities, and people of minority ethnicity) can assist the county in extending focused public outreach and education to these residents.

To assist residents to prepare for, and mitigate disasters, Snohomish County provides the following electronic resources:

1. A Natural Hazards Viewer map that allows residents to identify and better understand the hazards that impact their community: [NATURAL HAZARD VIEWER MAP](#).
2. The Snohomish County Planning and Development Department maintains a Flood Hazard webpage that provides the public with information on the flood hazard insurance program; flood hazard maps, the flood hazard permit process, and Shoreline regulations: [Flood-Hazard](#).

3. Recently launched, the Climate Vulnerability Tool (CVT) evaluates local communities' vulnerability to climate hazards like wildfires, flooding, and extreme heat. It provides a Combined Vulnerability Score for different areas, helping residents and policymakers prepare for climate impact: [Climate Vulnerability Tool \(CVT\)](#).

V. Strategic Plan

SP-05 Overview

Strategic Plan Overview

Based on the Needs Assessment, information gathered through consultations and the citizen participation process, and the Market Assessment, the Strategic Plan identifies current priority needs in the community and describes goals and strategies the Snohomish County Consortium plans to undertake during the 2025-2029 Consolidated Plan period to address these priority needs.

The Strategic Plan includes the following sections: 1) Geographic Priorities, 2) Priority Needs, 3) Influence of Market Conditions, 4) Anticipated Resources, 5) Institutional Delivery Structure, 6) Goals, 7) Public Housing, 8) Barriers to Affordable Housing, 9) Homeless Strategy, 10) Lead-Based Paint Hazards, 11) Anti-Poverty Strategy, 12) Monitoring.

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 44 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the County

Because the needs addressed by the Snohomish County Consortium exist throughout the county, investment of CDBG, HOME, and ESG funds for housing and non-housing community development projects are likewise anticipated to support projects in locations throughout the county. It is anticipated that some projects may benefit specific areas of the county, while others may provide county-wide benefits. It is anticipated that some CDBG projects will benefit all residents of an area, such as some public facility and infrastructure projects for streets, sidewalks, water/sewer systems, and parks, and these types of projects will be located in areas that consist predominately of low- and moderate-income households.

Based on current CDBG criteria for Snohomish County Consortium areas outside the City of Everett and the City of Marysville, these are areas where at least 48.4% (2024 Exception Criteria) of the households are low- and moderate-income income, with the percentages updated by HUD annually. In addition, pursuant to an interlocal agreement, 21% of HOME funds received each year are set-aside for City of Everett affordable housing projects which typically benefit residents of the City of Everett, with some more recent projects also benefiting residents of the City of Everett's Urban Growth Area.

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 45 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence
	Geographic Areas Affected	

	Associated Goals	CHDO Operating Support First-Time Homebuyer Assistance Grant Planning and Administration Homeowner Home Rehabilitation Homeowner Minor Home Repair Rental Housing Tenant-Based Rental Assistance
	Description	In order to help address the affordable housing needs of low- and moderate-income residents in Snohomish County, the Snohomish County Consortium will invest CDBG and HOME funds to help preserve, maintain, and increase the number of units of rental housing, provide tenant-based rental assistance, provide homeowner home repair and home rehabilitation assistance, provide first-time homebuyer assistance, and provide operating support for Community Housing Development Organizations. Investment shall be guided by the priority needs identified during development of the 2025-2029 Consolidated Plan.
	Basis for Relative Priority	The basis for relative priority includes the Needs Assessment and Market Analysis conducted as part of the 2025-2029 Consolidated Planning process, the 2025 Affordable Housing and Community Development Needs Survey, the Snohomish County Human Services Department 2023 Community Needs Assessment, the Housing Affordability Regional Taskforce (HART) Report and Five-Year Action Plan, and additional input received through the consultation and citizen participation process. The amount of CDBG and HOME grant funds projected to be available and eligible uses of funds were also taken into consideration.
2	Priority Need Name	Public Facilities
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	

	Associated Goals	Grant Planning and Administration Public Facilities 1 Public Facilities 2 Public Facilities 3 Public Facilities 4
	Description	In order to provide a suitable living environment in Snohomish County for, and expand the economic opportunities available to, low- and moderate-income persons and to special needs populations, the Snohomish County Consortium will invest CDBG funds to address public facility needs, prioritized at the municipal and community level, of low-income households and predominately low- and moderate-income neighborhoods and communities and other HUD-eligible populations throughout the county.
	Basis for Relative Priority	The Needs Assessment & Market Analysis conducted as part of the 2025-2029 Consolidated Planning process identified public facilities as a high need. This included the 2024 Affordable Housing and Community Development Needs Survey, historical application requests and award data, and other input received through the 2025-2029 consultation and citizen participation process. The amount of CDBG funds projected to be available and eligible uses of these funds were also taken into consideration.
3	Priority Need Name	Public Improvements and Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Grant Planning and Administration Infrastructure 1 Infrastructure 2

	Description	In order to provide for the health, safety, and welfare of Snohomish County's low- and moderate-income neighborhoods, the Snohomish County Consortium will invest CDBG funds to address the unmet basic infrastructure needs, prioritized at the municipal and community levels, of low- and moderate-income households and predominately low- and moderate-income neighborhoods and communities throughout the county.
	Basis for Relative Priority	The Needs Assessment conducted as part of the 2025-2029 Consolidated Planning process identified public improvements and infrastructure as a high need. This included the 2025 Affordable Housing and Community Development Needs Survey, historical application requests and award data, and other input received through the consultation and citizen participation process. The amount of CDBG funds projected to be available and eligible uses of these funds were also taken into consideration.
4	Priority Need Name	Public Services
	Priority Level	High
	Population	Extremely Low Low Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

	Geographic Areas Affected	
	Associated Goals	CDBG Public Services - Fair Housing CDBG Public Services - Homeless CDBG Public Services - Non Homeless Special Needs Grant Planning and Administration
	Description	The Snohomish County Consortium will invest CDBG funds to provide a range of public services for persons living with special needs and those experiencing homelessness or those at-risk of homelessness and fair housing counseling and education services. Services may include legal assistance, services for the elderly, disabled, or other persons with special needs, housing placement and stability services or services to assist people to access mainstream services or otherwise meet their specific needs.
	Basis for Relative Priority	The Needs Assessment and consultation and citizen participation conducted as part of the 2025-2029 Consolidated Planning process identified public services for persons living with special needs and those experiencing homelessness or at risk of homelessness as high needs. Services for persons living with special needs are identified needs as demonstrated through the Snohomish County Human Services Department 2023 Community Needs Assessment, the Snohomish County Consortium 2024 Affordable Housing and Community Development Needs Survey, and additional input received through the consultation and citizen participation process. The need for services for persons experiencing homelessness or at-risk of homelessness was also demonstrated through these avenues as well as through the annual Point-in-Time count, the Homeless Management Information System, coordinated entry system data, the 2019 Homeless Prevention and Response System Strategic Plan, and Continuum of Care consultation. Homeless data can be found in the Needs Assessment and Market Analysis sections of this plan. The need for fair housing education and counseling services was identified through the Snohomish County Consortium's 2019 Analysis of Impediments to Fair Housing Choice and will assist Snohomish County and Consortium members to affirmatively further fair housing in our jurisdictions. The amount of CDBG funds projected to be available and the eligible uses of these funds was also taken into consideration.
5	Priority Need Name	Homeless Shelter, Rapid Rehousing, and Homeless Management Information system (HMIS)
	Priority Level	High

	Population	Chronic Homelessness Individuals Families with Children Mentally Ill Substance Use Disorders Veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	ESG Homeless Emergency Shelter ESG Homeless Rapid Rehousing Grant Planning and Administration Homeless Management Information System
	Description	The Snohomish County Consortium will prioritize ESG funding to meet emergency shelter needs for services and operations, to meet the need for rapid rehousing through rent assistance and housing search and stability services, and for Homeless Management Information System (HMIS) costs.
	Basis for Relative Priority	The Needs Assessment and consultation and citizen participation conducted as part of the 2025-2029 Consolidated Planning process identified emergency shelter for services and operations and rapid rehousing as high needs. The Snohomish County 2024 Point-in-Time count data, Homeless Management Information System data, the 2019 Homeless Prevention and Response System Strategic Plan, the Snohomish County Human Services Department 2023 Community Needs Assessment, Continuum of Care consultation, coordinated-entry data and additional input received through the consultation and citizen participation process provide the basis for demonstrating the need. The amount of ESG funds projected to be available and eligible uses of these funds were also taken into consideration. HMIS is required to meet the data collection and reporting requirements for the U.S. Department of Housing and Urban Development.
6	Priority Need Name	Grant Planning and Administration
	Priority Level	High
	Population	Other

Geographic Areas Affected	
Associated Goals	Grant Planning and Administration
Description	A portion of the CDBG, HOME, and ESG funds will be used by Snohomish County, as lead agency of the Snohomish County Consortium, to undertake required grant planning and administration activities.
Basis for Relative Priority	This is a necessary activity for administration of CDBG, HOME, and ESG funds. Planned investment is guided by the projected funds to be available and the regulatory funding caps on these types of activities. This includes: 1) 15% of the annual CDBG allocation plus 15% of annual CDBG program income for eligible CDBG planning and administration costs; 2) 10% of the annual HOME allocation plus 10% of annual HOME program income for eligible HOME planning and administration costs; and 3) 7.5% of the annual ESG allocation for eligible administration costs.

Narrative (Optional)

As summarized in the Needs Assessment and Market Analysis sections of this plan, the affordable housing and non-housing community development needs for the Snohomish County Consortium far outweigh the amount of funding estimated to be available under the CDBG, HOME, and ESG programs to help address these needs. The priority needs listed above were developed based on the citizen participation and consultation process, the Needs Assessment, the Market Analysis, local and regional reports and strategic plans, the eligible uses of the grant funds and other grant requirements, and the estimated amount of funding and estimated program income projected to be available under these grant programs for the next five years.

The overall allocation plan for Snohomish County Consortium CDBG, HOME, and ESG grant funds is listed below. For information on allocation of City of Everett and City of Marysville CDBG grant funds, see the Participating Grantee CDBG Template for each of those jurisdictions.

CDBG:

- 20% of annual grant plus up to 20% of current year program income for grant planning and administration,
- 15% of annual grant plus up to 15% of prior year program income for public service projects,
- 55% of balance of grant funds for public facility and infrastructure projects, and
- 45% of balance of grant funds for housing projects.

HOME:

- 10% of annual grant plus 10% of current year program income for grant planning and administration,
- Up to 5% of grant for Community Housing Development Organization operating costs,
- 21% of annual grant for housing projects and programs selected through City of Everett process based on interlocal agreement, and
- Balance of annual grant for housing projects and programs selected through the Snohomish County Consortium process.

ESG:

- 7.5% of annual grant for grant administration, and
- Balance of annual grant to be used for emergency shelter, rapid rehousing, and Homeless Management Information System costs. Current allocation percentage is 38% of total for rapid rehousing, 44% of total for shelter, and 11% for HMIS. The allocation priorities and percentages may be adjusted over the upcoming five years as ongoing consultation with the Continuum of Care is required regarding allocation of these funds.

SP-30 Influence of Market Conditions - 91.415, 91.215(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The high level of immediate need for rental housing assistance for persons experiencing homelessness and at risk of homelessness; the high level of cost burden experienced by extremely low-income and low-income households; the significant gap in the market between the number of affordable rental units needed for extremely low-income and low-income households and the number of rental units currently affordable and available to households at these income levels; the long wait lists for Section 8 Vouchers, Public Housing, and other assisted housing; current market trends indicating that rental housing is not likely to become more affordable over the next five years; and other market barriers to housing for this population including security and utility deposits.
TBRA for Non-Homeless Special Needs	
New Unit Production	<p>The high level of cost burden among low- and moderate-income renters with incomes at or below 60% of the area median income, with the greatest cost burden experienced by extremely low-income and low-income renters at or below 50% of the area median income; the significant gap in the market between the number of affordable rental units needed for households at these income levels and the number of rental units currently affordable and available to households at these income levels; the long wait lists for Section 8, Public Housing, and other assisted housing; and current market trends indicating that rental housing is not likely to become more affordable over the next five years.</p> <p>The higher level of cost burden among low- and moderate-income homeowners with incomes at or below 80% of the area median income; the very low supply of homeowner units currently affordable and available to households at these income levels; and current market trends indicating that homeowner housing is not likely to become more affordable over the next five years.</p>
Rehabilitation	The age and condition of the housing stock and the age and condition of the assisted/subsidized housing stock. In addition, rehabilitation needs for housing units for elderly persons and persons with disabilities.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	<p>The number of assisted/subsidized rental housing units at risk of loss from the subsidized/assisted housing inventory in Snohomish County in the next five years; the high level of cost-burden experienced by extremely low-income, low-income, and moderate-income renters with incomes at or below 60% of the area median income; the gap in the market between the number of affordable rental units needed for households at these income levels and the number of rental units currently affordable and available to households at these income levels; the long wait lists for Section 8 Vouchers and other assisted housing; and current market trends indicating that rental housing is not likely to become more affordable over the next five years.</p> <p>The higher level of cost burden experienced by low- and moderate-income homeowners with incomes at or below 80% of the area median income, the very low supply of homeowner units currently affordable and available to households at these income levels; and current market trends indicating that homeowners housing is not likely to become more affordable over the next five years.</p>

Table 46 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

This section describes the resources anticipated to be available to help address the priority needs and objectives identified in this Strategic Plan. It includes federal funds and program income anticipated to be available under the Snohomish County Consortium CDBG, HOME, and ESG programs during the 2025-2029 Consolidated Plan period, broken out by Year 1 (Program Year 2025) and Remainder of Con Plan (Program Years 2026 to 2029). It also includes information on other federal, state, local, and private resources anticipated to be available.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,309,657	30,000	1,640,021	4,979,678	13,358,828	2025 CDBG allocation and CDBG program income is estimated. The 2026-2029 available remainder is estimated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,802,994.28	795,862	2,116,280	4,715,137	9,468,569	2025 HOME allocation is estimated and HOME program income is actual, and the 2026-2029 available remainder is estimated.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	287,596	0	0	287,596	1,150,384	2025 ESG annual allocation and the 2026-2029 available remainder are estimated.
Other	public - federal	Other	0	0	0	0	0	

Table 47 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG, HOME, and ESG funds leverage additional resources from a variety of private, state, and local funds. Applicants for projects to be funded from these programs provide information on leveraged funds during the application process and leveraging of resources is one of the criteria evaluated during the application review process for affordable housing and service projects. For Year 1 (Program Year 2025), it is estimated that CDBG, HOME, and ESG projects will have contributing funds of over \$120 million from other resources.

Matching funds are required for HOME and ESG funds. For these funds, project sponsors will be required to provide matching resources as part of the contracting process and will subsequently be monitored to document that the match was expended. The County will provide required matching funds for ESG funds used for County administration and County HMIS costs.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Snohomish County Housing Affordability Regional Taskforce (HART) examined a comprehensive set of data and reports which served as the foundation for a rich strategic plan. One of the key funding strategies in the plan is to identify and provide surplus and under-utilized publicly owned property for low-income housing. Their analysis found that, 'Finding and purchasing land is a major challenge in the construction of all housing. It is typically 10 to 20 percent of the cost of a project. Donating real property or offering discounted long term-leases for developers of low-income housing, can be a particularly effective way to make such projects viable. Jurisdictions are encouraged to survey their existing real estate holdings and determine if any properties may be declared surplus and made available for low-income housing development. That surveying process is currently underway in jurisdictions throughout Snohomish County.

There is no publicly owned land being used to address the needs identified in the 2025 Annual Action Plan.

Discussion

An estimated 169 million in other federal, state, local, and private funds anticipated/estimated to be available to help address the needs and objectives in Year 1 (Program Year 2025) of this Strategic Plan include:

HUD Continuum of Care, \$14,470,868

HUD Section 8 Housing Administration Funds (EHA), \$4,473,530

HUD Section 8 Housing Assistance Funds (EHA), \$55,593,970

HUD Section 8 Housing Administration Funds (HASCO), \$5,835,650

HUD Section 8 Housing Assistance Funds (HASCO), \$72,391,140

Snohomish County Affordable Housing Trust Fund, \$795,850

Snohomish County Ending Homelessness Program, \$5,435,000

Snohomish County General Funds, \$184,587

Snohomish County Sales Tax Affordable Housing Development Fund, \$833,379

Snohomish County Sales Tax Rental Voucher Program, \$1,256,572

Miscellaneous Other Sources of Federal Grant funds of \$3,147,926

Miscellaneous Foundation Grants and Private Donations, \$1,280,115

Miscellaneous Other State and local funding \$3,345,591

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CATHOLIC COMMUNITY SERVICES	Subrecipient	Homelessness Non-homeless special needs public services	
COCOON HOUSE	Subrecipient	Homelessness public services	
DOMESTIC VIOLENCE SERVICES OF SNOHOMISH COUNTY	Subrecipient	Homelessness public services	
FULL LIFE CARE	Subrecipient	Non-homeless special needs public services	
HOUSING HOPE	Subrecipient	Homelessness public services	
MERCY HOUSING NORTHWEST	Subrecipient	Non-homeless special needs Rental public services	
VOLUNTEERS OF AMERICA WESTERN WASHINGTON	Subrecipient	Homelessness Non-homeless special needs public services	
YWCA	Subrecipient	Homelessness public services	
ARLINGTON, CITY OF	Government	Planning neighborhood improvements public facilities	
MONROE, CITY OF	Government	Planning neighborhood improvements public facilities	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
MOUNTLAKE TERRACE, CITY OF	Government	Planning neighborhood improvements public facilities	
SULTAN, CITY OF	Government	Planning neighborhood improvements public facilities	
SNOHOMISH COUNTY	Government	Homelessness Ownership Planning neighborhood improvements public facilities	
CONSORTIUM POLICY ADVISORY BOARD	Other	Planning	
CONSORTIUM TECHNICAL ADVISORY BOARD	Other	Planning	
DARRINGTON, TOWN OF	Government	Planning neighborhood improvements public facilities	
EDMONDS, CITY OF	Government	Planning neighborhood improvements public facilities	
EVERETT, CITY OF	Government	Ownership Planning	
GOLD BAR, CITY OF	Government	Non-homeless special needs Planning neighborhood improvements public facilities	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
GRANITE FALLS, CITY OF	Government	Planning neighborhood improvements public facilities	
INDEX, TOWN OF	Government	Planning neighborhood improvements public facilities	
LAKE STEVENS, CITY OF	Government	Planning neighborhood improvements public facilities	
LYNNWOOD, CITY OF	Government	Planning neighborhood improvements public facilities	
MARYSVILLE, CITY OF	Government	Planning	
STANWOOD, CITY OF	Government	Planning neighborhood improvements public facilities	
EVERETT/SNOHOMISH COUNTY CONTINUUM OF CARE	Continuum of care	Homelessness Planning	
HOUSING HOPE PROPERTIES	CHDO	Ownership Rental	
SENIOR SERVICES OF SNOHOMISH COUNTY	Subrecipient	Non-homeless special needs public services	
MILL CREEK, CITY OF	Government	Planning neighborhood improvements public facilities	
MUKILTEO, CITY OF	Government	Planning neighborhood improvements public facilities	

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
SNOHOMISH, CITY OF	Government	Planning neighborhood improvements public facilities	
WOODWAY, CITY OF	Government	Planning neighborhood improvements public facilities	
BRIER, CITY OF	Government	Planning neighborhood improvements public facilities	
HOUSING AUTHORITY OF SNOHOMISH COUNTY	PHA	Planning Public Housing Rental	
EVERETT HOUSING AUTHORITY	PHA	Planning Public Housing Rental public services	

Table 48 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The list above includes entities that are anticipated to help in carrying out the Snohomish County Consortium's 2025-2029 Consolidated Plan Strategic Plan. It is anticipated that additional organizations and agencies not listed above will also help in achieving goals and strategies identified in this Strategic Plan. This includes additional organizations and agencies selected for project/program funding awards through the Snohomish County Consortium's application process for 2026-2029 CDBG, HOME, and ESG funds and additional organizations and agencies that may participate in other partnerships or collaborations to achieve the identified strategies. For additional information on organizations and agencies coordinating/collaborating through the Everett/Snohomish County Continuum of Care, see additional information provided in response below, PR-10 Consultation, MA-30 Homeless Facilities and Services, and SP-60.

Key strengths in the Snohomish County Consortium institutional structure continue to be the existence of a broad range of project sponsors for affordable housing and non-housing community development projects (public facilities, infrastructure improvements, public services), two public housing authorities, ongoing local government and resident input through the Snohomish County Consortium Technical

Advisory Committee and Policy Advisory Board, local community planning processes particularly around housing and homelessness, and the collaborative partnerships between the County, local governments, Everett/Snohomish County Continuum of Care, public agencies, private non-profit organizations, and faith-based organizations to address local housing and non-housing community development needs for low- and moderate-income persons.

The Snohomish County Housing Affordability Regional Taskforce (HART) Report and Five-Year Action Plan was created by County Executive Dave Somers to bring together elected leaders from cities across Snohomish County and the County Council, on the belief that the housing affordability challenge before us is intensifying and is best addressed collaboratively and proactively. The County will continue to collaborate with the housing development community to address the community capacity to develop, own, and operate affordable housing.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X		X
HIV/AIDS	X		
Life Skills	X	X	
Mental Health Counseling	X	X	X
Transportation	X	X	
Other			

Table 49 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and with mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) and persons with HIV within the jurisdiction:

The County's system of housing and services provides a centralized access point for financial assistance and supportive services available to homeless households and provides specialized services for special populations like veterans, the chronically homeless and unaccompanied youth, including persons with HIV/AIDS. Coordinated entry homeless housing navigators provide direct financial assistance, connections to mainstream services, and action planning with homeless households to help them obtain housing and stabilize. All homeless housing navigators use a common self-sufficiency matrix to determine appropriate referrals to services. The matrix gives individuals a score in sixteen different "life domains" ranging from safety to mental health, substance abuse and income. Households are connected with services ranging from employment, life skills, adult education, mental health, substance abuse, conflict resolution, civil legal, childcare, and children's services. Housing navigation and outreach is available at Catholic Community Services, Volunteers of America, Cocoon House, Domestic Violence Services of Snohomish County, Snohomish County Veteran's Assistance, and the PATH Projects for Assistance in Transition from Homeless) program. These programs are located throughout the county and provide outreach to vulnerable, hard to serve households as well as transportation vouchers to help families and individuals engage in services. The veteran's services agencies collaborate closely to meet the various service needs for veterans and to make referrals to other community services. Tailored services linkages are developed that crosswalk to life domains to streamline access for persons needed specific types of services, such as civil law or specialized employment services. Youth services are available throughout the county, including youth homeless prevention, homeless youth outreach and advocacy, navigation assistance to help youth access services, engage in education or employment activities, receive mental health or substance abuse treatment and to obtain stable housing if needed.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The strength of the service delivery system for the special needs population is that there are many service providers that provide these types of services. The main gap is the limited funding resources to meet the existing need.

In regard to the service delivery system for person experiencing homelessness, the strength of the service delivery system is that there are many providers and services available. The County in

partnership with the CoC has developed a number of effective referral pathways to expedite connections with tailored services. The homeless veterans provider group has a strong system in place to create a streamlined service veterans service delivery system. The outreach and engagement team, along with specific chronic homeless initiative staff have worked to improve service connection for these persons. While these are significant accomplishments, there is often not enough services for those in need, which primary comes down to funding, rather than an access issue or eligibility issue. For example, there has been a decrease in funding for those with HIV/AIDS, both with Housing Opportunities for Persons With AIDS (HOPWA) and HIV/AIDS specific medical case management, so planning is occurring into developing possible strategies for meeting the needs of this population. Another challenge is bringing all the stakeholders together that are necessary to build out a seamless service delivery system.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Services needs for the special needs population are included in the Priority Needs and Goals of the Strategic Plan, which will provide some funding to help meet these needs in the community.

For the homeless system, one strategy for overcoming gaps and addressing priority needs is increasing collaborative programming and integrated, cross-system approach. The Partnership to End Homelessness, and the Continuum of Care governance Board continues to focus on undertaking coordination with advocacy groups, housing and services providers and the homeless population. Cross-system collaboration with integrated care, including health and behavioral health systems, ensures individuals and families who are experiencing homelessness or who are at risk of homelessness receive the services needed to obtain and maintain permanent housing. For example, the Chronic Utilizer Alternative Response Team (CHART) continues to be a successful partnership, with representation from criminal justice, emergency response, human services, and research, which identifies chronic utilizers of costly criminal justice and emergency response systems. Each identified individual receives wrap-around services from a specialized team that helps connect individuals to treatment providers, public defenders, social workers, and medical professionals. CHART has brought together a number of key stakeholders, including the Snohomish County HSD, City of Everett, Everett Police Department, Everett Fire Department, Providence Regional Medical Center, Community Health Center, Snohomish County Jail, and Everett City Attorney's office. Cross-system collaboration with the criminal justice system also ensure that individuals and families who are experiencing homelessness or who are at risk of homelessness receive the services needed to obtain and maintain permanent housing. The County renovated the historic Carnegie Building into a Resource Center that serves individuals with mental health and/or substance use disorders who come into contact with the criminal justice system. The Community Service Center provides a variety of support and services in one location, including mental health and chemical dependency assessments, connections to mainstream resources, housing supports, and access to Coordinated Entry.

The County also directly supports Cocoon House which provides homelessness prevention services, shelter and housing, support with education and employment as well as other supportive services to unaccompanied youth and young adults. HUD Youth Homelessness Demonstration Program (YHDP) funding is used to address gaps in serving youth and young adults by collaborating the juvenile justice system and the Department of Children, Youth, and Families, including cross-system collaboration and a system-wide referral process. YHDP funding also provides emergency housing for young adults while they search for a long-term apartment, as well as rental assistance and housing stability support once housing is secured.

A number of pilot projects have been implemented in recent years to focus on how cross-systems collaboration can increase and promote successful client outcomes.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Rental Housing	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$600,000 HOME: \$5,352,730 (includes COE HOME Capital \$693,145)	Rental units constructed: 35 Household Housing Unit Rental units rehabilitated: 30 Household Housing Unit Other: 2 Other
2	Tenant-Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing	HOME: \$900,000 (includes COE \$400,000)	Tenant-based rental assistance / Rapid Rehousing: 325 Households Assisted
3	Homeowner Minor Home Repair	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$4,284,251	Homeowner Housing Rehabilitated: 1750 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homeowner Home Rehabilitation	2025	2029	Affordable Housing		Affordable Housing	HOME: \$809,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
5	First-Time Homebuyer Assistance	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$100,000 HOME PI: \$600,000	Homeowner Housing Added: 1 Household Housing Unit Direct Financial Assistance to Homebuyers: 10 Households Assisted
6	CHDO Operating Support	2025	2029	Affordable Housing		Affordable Housing	HOME: \$450,745	Other: 5 Other
7	Infrastructure 1	2025	2029	Non-Housing Community Development		Public Improvements and Infrastructure	CDBG: \$775,733	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5784 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Infrastructure 2	2025	2029	Non-Housing Community Development		Public Improvements and Infrastructure	CDBG: \$2,285,680	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 7640 Persons Assisted
9	Public Facilities 1	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$628,557	Other: 2 Other
10	Public Facilities 2	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$301,841	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3928 Persons Assisted
11	Public Facilities 3	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$1,198,349	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
12	Public Facilities 4	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$779,481	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3920 Persons Assisted
13	CDBG Public Services - Homeless	2025	2029	Homeless		Public Services	CDBG: \$1,999,972	Public service activities other than Low/Moderate Income Housing Benefit: 4355 Persons Assisted
14	CDBG Public Services Non-Homeless Special Needs	2025	2029	Non-Homeless Special Needs		Public Services	CDBG: \$326,896	Public service activities other than Low/Moderate Income Housing Benefit: 1370Persons Assisted
15	CDBG Public Services - Fair Housing	2025	2029	Fair Housing		Public Services	CDBG: \$141,875	Public service activities other than Low/Moderate Income Housing Benefit: 1950 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	ESG Homeless Emergency Shelter	2025	2024	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$602,600	Homeless Person Overnight Shelter: 3975 Persons Assisted
17	ESG Homeless Rapid Rehousing	2025	2024	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$575,780	Tenant-based rental assistance / Rapid Rehousing: 250 Households Assisted
18	Grant Planning and Administration	2025	2024	Planning and Administration		Affordable Housing Grant Planning and Administration Homeless Shelter, Rapid Rehousing, and HMIS Public Facilities Public Improvements and Infrastructure Public Services Community and Economic Development	CDBG: \$3,339,652 HOME: \$901,495 ESG: \$107,840	Other: 5 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	Homeless Management Information System	2025	2029	HMIS		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$151,860	Other: 5 Other

Table 50 – Goals Summary

Goal Descriptions

1	Goal Name	Rental Housing
	Goal Description	Preserve, maintain, increase, and provide accessibility improvements for rental units that are affordable to households with incomes at or below 60% of the area median income, with at least 90% of the units for households with incomes at or below 50% of the area median income and no more than 10% of the units for households with incomes above 50% and at or below 60% of the area median income. Activities anticipated to include acquisition, rehabilitation, and/or new construction. There is a need for rental housing that is affordable among all population types and household sizes in the county, with particular needs identified for small units, seniors, persons with physical and cognitive disabilities, persons with mental health illnesses, individuals and families experiencing homelessness, homeless unaccompanied youth and parenting youth up to age 24, singles, households with children including single parent families, and large families.
2	Goal Name	Tenant-Based Rental Assistance
	Goal Description	Provide tenant-based rental assistance and/or security deposits to persons experiencing homelessness or at-risk of homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs.
3	Goal Name	Homeowner Minor Home Repair
	Goal Description	Provide health- and safety-related minor home repairs to homeowners with incomes at or below 50% of the area median income who are elderly and/or living with disabilities to help them stay in their homes and to help maintain the current housing stock.

4	Goal Name	Homeowner Home Rehabilitation
	Goal Description	Provide housing rehabilitation loans to low- and moderate-income homeowners with incomes at or below 80% of the area median income to help them stay in their homes and to help maintain the current housing stock.
5	Goal Name	First-Time Homebuyer Assistance
	Goal Description	In order to increase homeownership by low- and moderate-income households, provide financing assistance for, and develop housing units for purchase by, first-time homebuyers with incomes at or below 80% of the area through purchase or downpayment assistance programs, self-help construction programs, and manufactured housing.
6	Goal Name	CHDO Operating Support
	Goal Description	Provide support for operating costs of Community Housing Development Organizations (CHDOs).
7	Goal Name	Infrastructure 1
	Goal Description	Support construction and rehabilitation of up to five street and/or sidewalk projects to principally benefit low- and moderate-income neighborhoods and/or which promote accessibility and mobility for elderly and disabled persons.
8	Goal Name	Infrastructure 2
	Goal Description	Support up to eleven other infrastructure projects, including but not limited to, water/sewer projects, flood drain improvements, and other flood mitigation needs to principally benefit low- and moderate-income households.
9	Goal Name	Public Facilities 1
	Goal Description	Support construction and/or rehabilitation of up to four public facilities which serve to remove material or architectural barriers to the mobility or accessibility of elderly persons and severely disabled adults.
10	Goal Name	Public Facilities 2
	Goal Description	Support acquisition, construction and/or rehabilitation of up to three public facilities which will principally benefit low- and moderate-income households, special needs populations, the homeless and those at risk of homelessness or abuse, and other HUD-defined "Presumed Benefit" populations which include: abused children, battered spouses, elderly persons, severely disabled persons, homeless persons, illiterate adults, persons living with AIDS, and migrant workers.

11	Goal Name	Public Facilities 3
	Goal Description	Support acquisition, construction and/or rehabilitation of up to four public facilities which will principally benefit low- and moderate-income households, including but not limited to, youth centers, childcare centers, health facilities, senior centers, and food banks.
12	Goal Name	Public Facilities 4
	Goal Description	Support acquisition, construction and/or rehabilitation of up to three (3) public facilities to principally benefit low- and moderate-income neighborhoods including but not limited to, parks and recreation, health centers, fire stations, and other neighborhood facilities.
13	Goal Name	CDBG Public Services - Homeless
	Goal Description	Provide services for persons experiencing homelessness or at-risk of becoming homeless, including individuals, families, unaccompanied youth, and/or persons with special needs.
14	Goal Name	CDBG Public Services – Non-Homeless Special Needs
	Goal Description	Provide services to persons living with special needs to assist them to access, maintain or stabilize in their housing, optimize self-sufficiency, and support safe independent living in the community. Persons living with special needs include, but are not limited to, elderly and frail elderly persons, persons with disabilities, victims of domestic violence (inclusive of the HUD Continuum of Care definition), persons with mental illness, persons with alcohol or other drug addictions, and persons living with HIV/AIDS.
15	Goal Name	CDBG Public Services - Fair Housing
	Goal Description	Provide fair housing education and counseling services to low- and moderate-income persons.
16	Goal Name	ESG Homeless Emergency Shelter
	Goal Description	Provide temporary, short-term shelter and crisis services that assist persons experiencing homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs, in receiving the services and resources they need to quickly move to permanent housing.

17	Goal Name	ESG Homeless Rapid Rehousing
	Goal Description	Provide rent assistance and housing search and stability services to persons experiencing homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs, who are staying in emergency shelters or assisted with an emergency motel voucher, transitional housing, and staying in places not meant for human habitation.
18	Goal Name	Grant Planning and Administration
	Goal Description	As the grant recipient and lead agency of the Snohomish County Consortium, Snohomish County will undertake required CDBG, HOME, and ESG grant planning and administration activities.
19	Goal Name	Homeless Management Information System
	Goal Description	Provide support for Homeless Management Information System costs for required data collection and reporting.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

During the 2025-2029 Consolidated Plan period, it is estimated that Snohomish County Consortium 2025-2029 CDBG, HOME, and ESG projects will provide affordable housing to 362 renter households and 1,781 homeowner and homebuyer households. Of the 362 renter households, it is estimated that 351 will be extremely low-income, 11 will be low-income, and 0 will be moderate-income. Of the 1,781 homeowner and homebuyer households, it is estimated that 1,484 will be extremely low-income, 657 will be low-income, and 2 will be moderate-income.

SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Not Applicable.

Activities to Increase Resident Involvements

HASCO plans to undertake the following activities to encourage its program residents to become more involved in management and participate in homeownership programs:

- Continue to have a resident Commissioner on its six-member Board of Commissioners which provides an important voice on the Board and represents the interests of residents.
- Continue to have a Resident Advisory Board to assist in the development of the annual Public Housing Agency Plan.
- Continue to print and distribute quarterly newsletters, including a holiday newsletter for Section 8 Housing Choice Voucher participants. The newsletters are designed to inform residents of news and updates at HASCO and to provide information on ways residents can become involved in HASCO activities, such as the resident Board Commissioner position and the Resident Advisory Board.
- Continue to host a monthly Lobby Day when Community Services specialists offer resources, books to children, and promote activities such as the Resident Advisory Board.
- Continue to offer community building and educational events onsite at our properties.
- Maintain an email contact list which participants may sign up for to receive information about upcoming engagement activities at HASCO and other community agencies.
- Continue to provide homeownership opportunities at three manufactured housing communities in Snohomish County. Continue to partner with HomeSight to provide purchase assistance and homeownership education and counseling.
- Continue to partner with HomeSight to provide the Manufactured Home Replacement Program at two manufactured housing communities. The program replaces outdated pre-HUD code homes with HUD-code, emergency efficient manufactured homes.

EHA plans to undertake the following activities to encourage its program residents to become more involved in management and participate in homeownership programs:

- Encourage a broad spectrum of residents to attend regular meetings of the EHA Resident Advisory Board to assist with the development of EHA's Public Housing Agency Plan.
- Encourage residents of properties with active resident councils to become involved with those councils.

- Appoint a resident to the Limited English Proficiency committee, which oversees compliance with the agency's LEP policy, to include evaluating the effectiveness of staff training and translation/interpretation services provided for LEP residents.
- Keep residents informed of management activities and other agency updates through the distribution of newsletters and flyers.
- Continue to maintain an active caseload of Family Self-Sufficiency (FSS) program participants.
- Continue partnerships with local agencies, such as Housing Hope, in order to promote homeownership options.
- Launch a new self-sufficiency pilot program called THRIVE+ that is adapted to serve households on a triennial recertification schedule and a far greater volume of families than traditional FSS programs.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the 'troubled' designation

Not Applicable.

SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)

Barriers to Affordable Housing

[Housing Affordability | Snohomish County, WA - Official Website](#)

Describe any negative effects of public policies on affordable housing and residential investment.

This section describes public policy barriers that may exist for affordable housing and residential development. Barriers may exist when the cost of housing or the incentives to develop, maintain, or improve affordable housing are negatively affected by public policies of the jurisdiction. Public policies include tax policies affecting land and other properties, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect return on residential investment.

Demand for affordable housing in the Puget Sound area has continued to increase due to several factors, including population growth, redevelopment of affordable housing into market rate housing, the lingering effects of the Covid-19 pandemic, low-vacancy rates for both rental housing at 4.3% and sales at 2%²¹. Existing programs include housing for homeless persons and those at risk of homelessness, rental housing preservation and development, homeowner home repair and rehabilitation, homeownership development, and purchase assistance for first-time homebuyers.

Responders to the 2025-2029 Survey were asked to list common barriers to low-income housing and common themes identified were lack of capital/funding resources, Lack of available land, limited number of affordable housing developers, materials and labor costs, community opposition, lack of tax incentives and Zoning and regulation/development restrictions.

Early in 2019, Snohomish County Executive, Dave Somers, created the Housing Affordability Regional Task Force (HART) <https://www.snohomishcountywa.gov/5422/HART>, to bring together elected leaders from cities across Snohomish County and the County Council, on the belief that the housing affordability challenge before us is intensifying and is best addressed collaboratively and proactively. The HART report, completed in January 2020, identified three goals to increase housing affordability at all income levels in Snohomish County:

1. Promote greater housing growth and diversity of housing types at all levels of affordability and improve jobs/housing connection,

Sub-Goal A: Promote greater housing growth and diversity of housing types and job/housing connections at all levels of affordability.

²¹ 2023 American Community Survey (ACS)

Sub-Goal B: Promote greater housing growth and diversity of housing types and job/housing connections for homes affordable to households at or below 60% AMI.

2. Identify and preserve existing housing at risk of rapid rent escalation or redevelopment balancing this with the need for more density, and
3. Increase housing density on transit corridors and/or in job centers, while also working to create additional housing across the entire county.

The HART report concluded, in part, that Snohomish County has seen a significant decrease of housing affordability and production has not kept up with the needs of the growing population, in terms of housing units completed and the cost to rent or purchase a home. Snohomish County will continue to follow the recommendations and goals outlined in the HART Report.²²

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Describe the specific efforts to be undertaken to reduce the barriers to affordable housing.

Snohomish County has significantly reduced barriers to affordable housing over the last several years by streamlining the permitting process, amending [Ordinance 22-006](#) relating to the Growth Management – revising Accessory Dwelling unit regulations to allow DADUs on substandard lots and changes distance requirements from the main structure, creating more flexibility for the placement of DADUs in rural areas, collection of a 0.1% tax to support new units of affordable housing, and approval of regulations that address the housing affordability crisis by increasing the supply of housing and reducing barriers to development.

In August 2024, Snohomish County Council voted to adopt four pieces of legislation to address housing affordability and made adjustments to county code in an effort to increase the available supply of market-rate housing and drive down costs, including: [Ordinance 24-058](#) amends county regulations related to lot size averaging, reducing minimum lot widths in urban zones and simplifying open space requirements; [Ordinance 24-059](#) introduces flexibility within parking regulations, allowing for more efficient single-family developments; [Ordinance 24-060](#) reduces minimum lot size requirements in low-density multiple residential zones, enabling more efficient development; and [Ordinance 24-061](#) creates more flexibility for the subdivision of duplexes and creates consistency within the regulations with other similar housing types.

²² <https://www.snohomishcountywa.gov/5422/HART>

SP-60 Homelessness Strategy - 91.415, 91.215(d)

Describe how the jurisdiction's strategic plan goals contribute to:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Snohomish County Human Services Department works with key stakeholders to meet the goal of effectively engaging those experiencing homelessness and reduce their barriers to housing. The Outreach Coalition (OC) provides a monthly venue for cross-system collaboration with a variety of organizations to identify and locate those experiencing homelessness and coordinate outreach and engagement efforts. Organizations that participate in the OC include homeless housing service providers, PATH, programs serving homeless youth, providers of Behavioral Health services, social service professionals embedded in law enforcement and EMS/Fire Service, Veterans Affairs, municipal employees and tribal partners. Examples of local outreach efforts includes:

- Co-responders (social service professionals embedded with law enforcement or Fire/EMS Services) identify and locate individuals experiencing homelessness, connect them to housing, Behavioral Health, health, and other essential services. Snohomish County, seven cities, local transit and area tribes currently operate co-response programs in partnership with local First Responders.
- The Diversion Center provides space for individuals experiencing homelessness that are identified by co-responders to await inpatient treatment and connection to services.
- The Carnegie Resource Center provides a one-stop resource for community to homeless housing resources, including coordinated entry, employment/education navigation, and other mainstream services.
- Student Support Advocates and McKinney Vento Homeless Liaisons in schools identify homeless/at-risk students and connect households to housing and services.

All unsheltered individuals and families are first assessed using coordinated entry tools and processes. Individuals and families are then connected directly to homeless housing navigators who work with the household to reduce barriers to obtaining housing and/or accessing needed services. Homeless youth outreach is done primarily through Cocoon House's youth outreach program. Cocoon House also has advocates who are available throughout the county to meet the safety and service needs of unaccompanied minors. Unaccompanied minors are assessed for youth specific services and housing. Unaccompanied young adults ages 18-24 are assisted with specialized supports and are connected to mainstream services and/or housing where appropriate. Youth and young adults are also entered into coordinated entry and assessed with common tools. Tailored supportive services are based upon assessment of need and include mental health and substance abuse services, assistance signing up for mainstream benefits and accessing health care, legal services, and specialized services for specific

populations. Navigators increase the likelihood that chronically homeless and vulnerable homeless persons access the appropriate services by providing progressive outreach and support when needed.

Addressing the emergency and transitional housing needs of homeless persons

Consultation with the Continuum of Care (CoC) and key stakeholders shows the continued need for shelter for all persons experiencing homelessness. Housing search can be difficult for those who have significant housing barriers, such as multiple evictions or criminal histories. Lower rental market vacancy rates and the lack affordable housing stock can also contribute to longer periods of time spent in the housing search.

The need continues for emergency shelter beds for vulnerable individuals and families while they search for appropriate housing. Emergency Shelter offers temporary, short-term shelter and crisis services to homeless individuals and families. For many, emergency shelter is the only option to immediately alleviate a short-term housing crisis. Like other successful interventions, emergency shelters maintain a strong focus on quickly assisting individuals and families to move into permanent housing, either on their own or with the assistance of another intervention via the Coordinated Entry System (e.g., rapid rehousing). In Snohomish County, emergency shelters operate under a variety of program models, including year-round, drop-in, and seasonal (i.e., shelters that are open during the cold weather season). Some emergency shelters are also targeted to specific subpopulations, such as youth and young adults, or survivors of domestic violence.

Emergency shelters in Snohomish County operate via a low-barrier approach. Low-barrier shelters are essential to ensuring the homeless housing and service system is accessible to those most in need. These shelters also increase system efficiencies by creating pathways to permanent housing for chronic utilizers of emergency services.

Households residing in transitional housing programs are provided housing stability services and deep rental subsidy. Transitional housing program resources are individualized for specific populations for whom evidence has shown intensive supports are appropriate. There continues to be need for transitional housing for specialized populations such as victim of domestic violence and youth under 18, as they transition from emergency shelter to other stable housing options. Youth are also assisted with life skills and pre-employment activities such as GED completion, and connections to internships, apprenticeships or other job skills programs. Those fleeing domestic violence and still in danger are assisted with safety plans and connections to appropriate programs to access housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

Coordinated Entry (CE) is a process for people who are homeless or at-risk of homelessness to access needed homelessness prevention, housing, and/or other supportive services. CE incorporates uniform

assessment, prioritization, program matching, and connections to mainstream services to help those seeking housing and services to access programs more efficiently.

CE Navigators work with individuals and families to address their current housing crisis and immediate barriers to housing stability by providing direct referrals to tailored services by CE service partners. Tailored Services include landlord dispute resolution, family mediation, civil legal assistance, mental health and substance use disorder services, and a range of employment and job training programs. By providing these next-step referrals, Navigators can assist individuals and families to identify and resolve their immediate barriers to housing stability and retention.

Homeless housing vacancies are filled according to Orders of Priority adopted by the Partnership to End Homelessness Continuum of Care (CoC) Board. Prioritization is based on the length of time an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter *and* the severity of the individual's or family's service needs. These Orders of Priority have been adopted to ensure that the community's most vulnerable individuals and families are housed as quickly as possible.

Consistent with evidence-based practices, Snohomish County's (CoC) has adopted a low-barrier and Housing First approach and is expanding implementation to all levels of the homeless housing and service system. Housing First means that no individual or family is denied housing because of challenges with sobriety or substance use, poor credit, or financial history, or have past criminal justice involvement. Safe and stable housing is viewed as the first step in meeting these challenges and provides individuals and families with a foundation on which they are then able to address barriers to housing stability. Housing First also creates efficiencies in the homeless housing and service system by providing pathways to permanent housing for chronic users of costly emergency response, health care, behavioral health, and other social services.

Homeless veterans are served through the veterans' partnership including coordinated entry housing and prevention navigation, employment, and other mainstream supportive services. The CE system for veterans connects veterans with the homeless housing intervention that is appropriate to meet their needs as quickly as possible. Rapid Rehousing resources are available for use within the veterans' system through Supportive Services for Veteran Families (SSVF) programs so that homeless veterans have access to permanent housing. Chronically homeless veterans may be served through the Veterans Affairs Supportive Housing (VASH) program or permanent supportive housing programs through the CE process.

CE for homeless unaccompanied youth is done through Cocoon House. Cocoon House provides services for young adults ages 18-24 and specialized services for youth under 18 to assist in identifying permanent housing options. Homeless unaccompanied minors who cannot be reunified with their families have access to transitional housing. Youth served in these programs are connected with life skills training and other pre-employment activities such as GED completion, adult basic education and connections to internships, apprenticeships and/or other job skills programs. Various services are available to help youth increase their life skills and resiliency toward increased self-sufficiency. Young

adults ages 18-24 have access to permanent housing options that include specialized rapid rehousing, other permanent housing, and permanent supportive housing that is largely a set aside within a larger homeless housing project.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs.

Homelessness prevention navigators work with those who are imminently homeless, including those with low income. These individuals and families may be facing evictions, exiting mental hospitals or treatment facilities, or are getting forced out of temporary housing options. The prevention navigators assist these individuals and families to resolve their housing crisis and avoid experiencing homelessness through increasing income, resolving conflicts with landlords or family members, and connecting with civil legal services to prevent eviction, when necessary. Prevention navigators are able to contact landlords to understand their perspective and willingness to stop evictions and/or other notice violations through a mutually beneficial agreement. Navigators can also provide housing search and move-in assistance when it is necessary to move to another permanent housing situation due to concerns for safety, stability, and/or affordability. Prevention navigators have access to flexible funds that can pay rents, program fees, etc. in order to stabilize housing or obtain housing. To increase housing stability and reduce barriers to housing retention, navigators provide comprehensive and individualized services to households, including education, life skills, financial counseling and credit repair and affordable health care.

In 2018, Snohomish County Human Services, Behavioral Health Division, in partnership with Pioneer Human Services opened the Carnegie Resource Center (CRC). The CRC operates as a hub for individuals within Snohomish County, to provide the opportunity to seek out and become connected to community services, such as housing, mental health, and substance use treatment. Agencies with expertise in these areas will be able to offer appointment times to complete applications and assessments and pass on important information about services to clients.

The Snohomish County Diversion Center (SCDC) is a residential shelter and jail diversion program opened in 2019 to serve homeless individuals at risk of arrest for minor infractions who have substance use and/or co-occurring mental health disorders and were referred to the SCDC by law enforcement officers throughout Snohomish County. Upon entry into the facility, SCDC staff work in collaboration with the referring social service professionals to connect participants to substance use disorder treatment.

The County also directly supports Cocoon House which provides homelessness prevention services, shelter and housing, support with education and employment as well as other supportive services to

unaccompanied youth and young adults. Cocoon House serves as a coordinated entry site for youth under the age of twenty-five. This agency provides family reunification support where appropriate and emergency shelter for youth under 18 when reconciliation is not possible. Examples of youth and young adult specific programming include:

- The Youth Engagement Team provides a team of mobile navigators and a designated behavioral health specialist to work with youth up to 21 years old to identify natural supports, community resources and to secure safe, viable housing options. The program has intentional connections to the juvenile justice system and the Department of Children, Youth, and Families, including cross-system collaboration and a system-wide referral process.
- The Family Advocate Program provides support for families, both caretakers and youth, to improve communication, build trust and stabilize the family to prevent youth from becoming homeless.

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

In order to address the risk of lead-based paint hazards, Snohomish County requires projects and programs funded with CDBG, HOME, and ESG funds it administers to comply with lead-based paint regulations for rehabilitation work on structures built before 1978.

Proposed projects are first reviewed for lead-based paint hazards during the application review process. If the project is selected for funding and lead-based paint is found to be a hazard, project sponsors are required to comply with the applicable federal lead-based paint requirements regarding reduction of the hazard. Funded projects and programs are monitored by Snohomish County Human Services Department staff to ensure compliance with federal regulations, such as notification of lead-based paint hazards, performance of work by certified workers according to acceptable procedures, and clearance of the work by certified inspectors. Project sponsors for the homeowner home rehabilitation and minor home repair programs assess lead hazard risks for homes rehabilitated and repaired under those programs and follow lead-based paint requirements for homes found to be at risk.

How are the actions listed above related to the extent of lead poisoning and hazards?

While Snohomish County does contain housing units older than 1978, some of which are estimated to be occupied by low- and moderate-income families, based on information reviewed in the Market Analysis of this plan, the overall lead exposure risk in Snohomish County, outside the City of Everett and the City of Marysville, is low with a few pockets that may have more risk due to older homes or other higher risk factors. Requiring projects and programs that seek funding under the CDBG, HOME, and ESG programs to comply with the lead-based paint requirements helps reduce the risk that is present. Please also see Section 65 of the Non-Housing Community Development Plans for the City of Everett and the City of Marysville for additional information on actions to address lead-based paint hazards in those jurisdictions.

How are the actions listed above integrated into housing policies and procedures?

The actions listed above are included in the Snohomish County Consortium application, contracting, and monitoring processes.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The mission of the Snohomish County Human Services Department is to help all persons meet their basic needs and develop their potential by providing timely, effective human services and building community. The Department is guided by a core set of values to act as a catalyst for enhancing our communities' own intrinsic abilities to support and care for their residents. Snohomish County is the local community action agency with the primary aim of helping low-income individuals and families move from poverty toward self-sufficiency through the integration of an array of services designed to increase well-being, education, and employment opportunities.

The groundwork is being laid for Snohomish County to continue enhancing its comprehensive and effective workforce system under the direction of the Snohomish County Executive and the local workforce development board appointed by the Executive. The provision of employment opportunities is central to Snohomish County's anti-poverty strategy which creates synergy between nine industry sectors targeted for attraction, retention, and expansion and the need of low-income residents countywide.

One example is the high priority Snohomish County is placing on addressing the workforce development needs of individuals who are experiencing and at risk of homelessness through the Housing Stability and Employment Initiative pilot grant. This Initiative, funded by Building Changes, assists previously homeless community residents served by rapid rehousing and vulnerably housed community residents engaged in early learning programs realize the importance of embedding education and employment goals in their life stability plans.

Benefits planning is incorporated into the above work, as are services which help individuals to use subsidies to advance their skill building, training, and self-sufficiency building goals while they access other critical housing stability services. Strategies to remove barriers to education and employment engagement are also prioritized and include connecting community residents to resources such as childcare, tutoring, transportation, work clothing, and tools. Career development services are delivered by skilled navigators through a trauma-informed lens in a supportive environment. In this system, those community residents who are ready for, or nearly ready for, employment are directed by Coordinated Entry staff to mainstream employment resources like the network of WorkSource American Job Center sites throughout the county as well as programs funded by Workforce Snohomish, a local workforce development partner, to continue their job search and pursue demand-driven training.

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childcare, tutoring, transportation, work clothing, and tools. Career development services are delivered by skilled navigators through a trauma-informed lens in a supportive environment. In this system, those community residents who are ready for, or nearly ready for, employment are directed by Coordinated Entry staff to mainstream employment resources like the network of WorkSource American Job Center sites throughout the county as well as programs funded by Workforce Snohomish, a local workforce development partner, to continue their job search and pursue demand-driven training.

Those who face additional barriers to employment and are assessed to need more education or training, will be referred to available English as a Second Language, high school completion-related programs, social enterprises, apprenticeships, and/or to postsecondary opportunities where they can earn short-term certificates, engage in training, and/or job readiness and job search workshops.

As part of these efforts, those who need more intensive supports but who are not eligible at the time of assessment for vocational rehabilitation, Supplemental Security Income, Social Security Disability Insurance, Veterans Assistance, or other benefit services will be referred to county-contracted social enterprise providers to engage in a modified, time-limited subsidized work experience programs while their progress is tracked.

Those who require and are eligible for the most intensive subsidy supports will be connected to the appropriate supported employment services. All engaged in this assessment-driven employment system will have access to professionals who have the skills to incorporate benefit planning and to promote and support employment transitions through a trauma-informed care model.

On a broader scale, Snohomish County Aging and Disability Services, Behavioral Health, Developmental Disabilities and Early Learning, Housing and Community Services, and Veterans Assistance Program staff recognize that some persons engaged in these systems will have more positive life outcomes if education and employment is part of their life plan. Staff are informing persons discharged from hospitals and those engaged in or exiting foster care, hospitals, behavioral health treatment, and justice programs about the resources they could access from workforce development partners.

Additionally, the HUD Section 3 program requires that grant recipients of CDBG and HOME funds provide job training, employment, and contracting opportunities for low-income residents in connection with contraction projects and activities in their neighborhoods to the greatest extent possible. The Department continues to effectively operate its Section 3 Plan to ensure that these opportunities are made widely available to low-income residents and Section 3 business concerns of our communities.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The Department has aligned its goals, programs, and policies for ending poverty in our communities with comprehensive land use strategies and the HUD strategic goals of using housing as a platform to

improve quality of life and building strong, resilient, and inclusive communities. We are committed to the objectives of promoting health and housing stability of vulnerable populations, promoting economic development and economic resilience, affirmatively furthering fair housing, and increasing the health and safety of homes.

The Department is aligning its affordable housing plan with the Planning and Development Department General Planning Policies that accompany that report. The Department collaborates with the Partnership to End Homelessness CoC Board to support a coordinated effort to prevent and end homelessness in Snohomish County. This includes partnering with local agencies to implement system transformations that focus on the most effective and efficient interventions and evidence-based practices for quickly moving individuals and families experiencing homelessness into permanent housing.

To realize our aims, the Department utilizes the housing programs funded through the Consolidated Plan with our other programs and services to address the needs of the lowest-income, most vulnerable households in our communities. These efforts include focusing CDBG and HOME rental housing projects on serving extremely low-income and low-income households and vulnerable households with special needs. We support an array of services designed to affirmatively further fair housing and access to economic opportunities. Our minor home repair program is increasingly focused on health and safety measures and healthy homes principles to ensure that we are retaining existing housing stock as well as creating new affordable housing stock.

We are collaborating extensively with local municipalities and the two Public Housing Authorities within our jurisdiction to ensure housing is coupled with appropriate subsidies as well as an expanded menu of economic opportunity services. We have also served as a pilot site for new programs that couple housing-choice housing with economic opportunity services. Our ultimate aim is to increase the number of households that move out of poverty and make our county's affordable housing stock available to those most in need. This will, in turn, serve as the platform for improving the quality of life for Snohomish County's most vulnerable residents and enhance the resiliency and inclusiveness of all our communities.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Monitoring of organizations, agencies, and municipalities for activities assisted with CDBG, HOME, and ESG funds administered by Snohomish County through the Snohomish County Consortium is conducted by the Snohomish County Human Services Department. The City of Everett Department of Community Development also conducts some monitoring for projects funded out of the portion of HOME funds set-aside for Everett projects, with oversight monitoring conducted by Snohomish County. On-site physical inspections of some HOME-assisted rental housing properties are conducted by the Washington State Department of Commerce, under a Memorandum of Understanding with Snohomish County, and any inspection reports and required remedial actions and responses are provided to Snohomish County.

Program performance and compliance monitoring is conducted in accordance with the specific requirements for each of the three grant programs and the type of activities receiving funding. Monitoring activities include: ongoing communications with, and technical assistance to, the organizations, agencies, and municipalities receiving funds before and during project implementation regarding grant requirements such as participant and activity eligibility, environmental, relocation, procurement, construction bidding, construction, labor standards, contractor payment schedules, change orders, and final inspection; risk assessment; on-site monitoring including an entrance interview, review of grant activities, participant files, program and fiscal policies and procedures, and other records, and written notice of monitoring results and follow-up if needed; and remote monitoring such as desk review of invoices to ensure costs are expended within the approved budget and for eligible costs and review of performance reports.

The Snohomish County Human Services Department provides, where necessary and appropriate, technical assistance, recommendations and/or corrective measures to ensure that projects are operated in compliance with applicable rules and regulations. If a project sponsor fails to implement a corrective action plan and continues to operate a project in non-compliance, the Snohomish County Human Services Department will follow contracting procedures for suspension or termination of the contract.

Public facility and infrastructure activities and HOME-assisted rental housing properties are also monitored for a period of years after completion to ensure continued compliance with grant requirements during the public benefit period. The HOME monitoring includes on-site physical inspections to ensure that property standards continue to be met.

Snohomish County continues its policy of ensuring that business enterprises owned by minorities and women (M/WBEs) are given an equal opportunity to compete for projects receiving funding through

Snohomish County Consortium grant funds by: 1) referring subgrantees to the internet website maintained by the State of Washington with a list of qualified M/WBEs, 2) including the County's policy on M/WBE opportunity in contracts, and 3) discussing M/WBE requirements at pre-bid and pre-construction meetings with subgrantees and their contractors.

Snohomish County prepares a Consolidated Annual Performance and Evaluation Report (CAPER) after the end of each program year that reviews program performance and whether the specific goals and strategies are being met.

VI. 2025 Annual Action Plan - Expected Resources

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

This section describes the resources anticipated to be available to help address the priority needs and objectives identified in this Strategic Plan. It includes federal funds and program income anticipated to be available under the Snohomish County Consortium CDBG, HOME, and ESG programs during the 2025-2029 Consolidated Plan period, broken out by Year 1 (Program Year 2025) and Remainder of Con Plan (Program Years 2026 to 2029). It also includes information on other federal, state, local, and private resources anticipated to be available.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Caplan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,309,657	30,000	1,640,021	4,979,678	13,358,628	The 2025 CDBG allocation and CDBG program income is estimated. The 2026-2029 available remainder is estimated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Caplan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,802,994	795,862	2,116,280	4,715,137	9,468,569	2025 HOME allocation is estimated, HOME program income is actual, and the 2026-2029 available remainder is estimated.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Caplan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	287,596	0	0	287,596	1,150,384	2025 ESG annual allocation and 2026-2029 available remainder is estimated.
Other	public - federal	Other	0	0	0	0	0	

Table 51 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG, HOME, and ESG funds leverage additional resources from a variety of private, state, and local funds. Applicants for projects to be funded

from these programs provide information on leveraged funds during the application process and leveraging of resources is one of the criteria evaluated during the application review process for affordable housing and service projects. For Year 1 (Program Year 2025), it is estimated that CDBG, HOME, and ESG projects will have contributing funds of over \$9.5 million from other resources.

Matching funds are required for HOME and ESG funds. For these funds, project sponsors will be required to provide matching resources as part of the contracting process and will subsequently be monitored to document that the match was expended. The County will provide required matching funds for ESG funds used for County administration and County HMIS costs.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Snohomish County Executive Dave Somers convened a Housing Affordability Regional Taskforce (HART) with cities and towns throughout the county to develop a five-year action plan that identifies priorities for county and city governments to accelerate our collective ability to meet the housing affordability needs of all Snohomish County residents and set a foundation for continued success through 2050. Over the course of several months, HART examined a comprehensive set of data and reports which served as the foundation for a rich strategic plan. One of the key funding strategies in the plan is to identify and provide surplus and under-utilized publicly owned property for low-income housing. Their analysis found that, 'Finding and purchasing land is a major challenge in the construction of all housing. It is typically 10 to 20 percent of the cost of a project. Donating real property or offering discounted long-term leases for developers of low-income housing, can be a particularly effective way to make such projects viable. Jurisdictions are encouraged to survey their existing real estate holdings and determine if any properties may be declared surplus and made available for low-income housing development.' That surveying process is underway in jurisdictions throughout Snohomish County.

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Tenant-Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing	HOME: \$200,000	Tenant-based rental assistance / Rapid Rehousing: 93 Households Assisted
2	CDBG Public Services - Fair Housing	2025	2024	Fair Housing		Public Services	CDBG: \$28,375	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
3	Homeowner Minor Home Repair	2025	2029	Affordable Housing		Affordable Housing	CDBG: \$976,851	Homeowner Housing Rehabilitated: 370 Household Housing Unit
4	CDBG Public Services - Homeless	2025	2029	Homeless		Public Services	CDBG: \$354,908	Public service activities other than Low/Moderate Income Housing Benefit: 597 Persons Assisted
5	CDBG Public Services - Non Homeless Special Needs	2025	2029	Non-Homeless Special Needs		Public Services	CDBG: \$117,665	Public service activities other than Low/Moderate Income Housing Benefit: 490 Persons Assisted
6	First-Time Homebuyer Assistance	2025	2029	Affordable Housing		Affordable Housing	CDBG: HOME: \$36,357.95	Direct Financial Assistance to Homebuyers: 1 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	CHDO Operating Support	2025	2029	Affordable Housing		Affordable Housing	HOME: \$90,149	Other: 1 Other
8	ESG Homeless Emergency Shelter	2025	2029	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$120,500	Homeless Person Overnight Shelter: 715 Persons Assisted (340 HH)
9	Grant Planning and Administration	2025	2029	Planning and Administration		Grant Planning and Administration	CDBG: \$667,930 HOME: \$180,299 ESG: \$21,568	Other: 1 Other
10	Homeless Management Information System	2025	2029	HMIS		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$30,372	Other: 1 Other
11	Infrastructure 2	2025	2029	Non-Housing Community Development		Public Improvements and Infrastructure	CDBG: \$2,583,332	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: Households: 145 households Persons Assisted: 1465
12	Homeowner Home Rehabilitation	2025	2029	Affordable Housing		Affordable Housing	HOME: \$226,608.09	Homeowner Housing Rehabilitated: 5 Household Housing Unit
13	ESG Homeless Rapid Rehousing	2025	2029	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: \$115,156	Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Public Facilities 3	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: \$250,617	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1 other 1400 people
15	Rental Housing	2025	2029	Affordable Housing		Affordable Housing	HOME: \$3,981,723.70	Rental Housing Units Constructed: 13

Table 52 – Goals Summary

Goal Descriptions

1	Goal Name	Tenant-Based Rental Assistance
	Goal Description	Provide tenant-based rental assistance and/or security deposits to persons experiencing homelessness or at-risk of homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs.
2	Goal Name	CDBG Public Services - Fair Housing
	Goal Description	Provide fair housing education and counseling services to low- and moderate-income persons.
3	Goal Name	Homeowner Minor Home Repair
	Goal Description	Provide health- and safety-related minor home repairs to homeowners with incomes at or below 50% of the area median income who are elderly and/or living with disabilities to help them stay in their homes and to help maintain the current housing stock.
4	Goal Name	CDBG Public Services - Homeless
	Goal Description	Provide services for persons experiencing homelessness or at-risk of becoming homeless, including individuals, families, unaccompanied youth, and/or persons with special needs.

5	Goal Name	CDBG Public Services - Non Homeless Special Needs
	Goal Description	Provide services to persons living with special needs to assist them to access, maintain or stabilize in their housing, optimize self-sufficiency, and support safe independent living in the community. Persons living with special needs include, but are not limited to, elderly and frail elderly persons, persons with disabilities, victims of domestic violence (inclusive of the HUD Continuum of Care definition), persons with mental illness, persons with alcohol or other drug addictions, and persons living with HIV/AIDS.
6	Goal Name	First-Time Homebuyer Assistance
	Goal Description	In order to increase homeownership by low- and moderate-income households, provide financing assistance for, and develop housing units for purchase by, first-time homebuyers with incomes at or below 80% of the area through purchase or downpayment assistance programs, self-help construction programs, and manufactured housing.
7	Goal Name	CHDO Operating Support
	Goal Description	Provide support for operating costs of Community Housing Development Organizations (CHDOs).
8	Goal Name	ESG Homeless Emergency Shelter
	Goal Description	Provide temporary, short-term shelter and crisis services that assist persons experiencing homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs, in receiving the services and resources they need to quickly move to permanent housing.
9	Goal Name	Grant Planning and Administration
	Goal Description	As the grant recipient and lead agency of the Snohomish County Consortium, Snohomish County will undertake required CDBG, HOME, and ESG grant planning and administration activities.
10	Goal Name	Homeless Management Information System
	Goal Description	Provide support for Homeless Management Information System costs for required data collection and reporting.

11	Goal Name	Homeowner Home Rehabilitation
	Goal Description	Provide housing rehabilitation loans to low- and moderate-income homeowners with incomes at or below 80% of the area median income to help them stay in their homes and to help maintain the current housing stock.
12	Goal Name	ESG Homeless Rapid Rehousing
	Goal Description	Provide rent assistance and housing search and stability services to persons experiencing homelessness, including individuals, families, unaccompanied youth, and/or persons with special needs, who are staying in emergency shelters or assisted with an emergency motel voucher, transitional housing, and staying in places not meant for human habitation.
13	Goal Name	Public Facilities 3
	Goal Description	Support acquisition, construction and/or rehabilitation of up to four public facilities which will principally benefit low- and moderate-income households, including but not limited to, youth centers, childcare centers, health facilities, senior centers, and food banks.
14	Goal Name	Rental Housing
	Goal Description	Preserve, maintain, increase, and provide accessibility improvements for rental units that are affordable to households with incomes at or below 60% of the area median income, with at least 90% of the units for households with incomes at or below 50% of the area median income and no more than 10% of the units for households with incomes above 50% and at or below 60% of the area median income. Activities anticipated to include acquisition, rehabilitation, and/or new construction. There is a need for rental housing that is affordable among all population types and household sizes in the county, with particular needs identified for small units, seniors, persons with physical and cognitive disabilities, persons with mental health illnesses, individuals and families experiencing homelessness, homeless unaccompanied youth and parenting youth up to age 24, singles, households with children including single parent families, and large families.
15	Goal Name	Infrastructure 2
	Goal Description	Support up to eleven other infrastructure projects, including but not limited to, water/sewer projects, flood drain improvements, and other flood mitigation needs to principally benefit low- and moderate-income households.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The project descriptions below provide a concise summary of the activities that will be undertaken during the upcoming 2025 program year to address priority needs and goals established in the Strategic Plan of the Consolidated Plan.

#	Project Name
1	ESG Rapid Rehousing, Emergency Shelter, HMIS, and Grants Administration
2	Catholic Community Services - Pregnant and Parenting Housing Program
3	Cocoon House - East Shelters
4	Domestic Violence Services of Sno Co – Domestic Violence Emergency Shelter Advocacy
5	Housing Hope – Homeless Teen & Young Parent Program
6	Senior Services of Snohomish County DBS Homage - Food and Nutrition Services
7	Mercy Housing Northwest - Senior and Disabled Support Services
8	Snohomish County Legal Services - Legal Assistance for Low-Mod Income Residents of Sno. Co.
9	YWCA of Seattle-King-Snohomish County – Families in Transition
10	Monroe Gospel Women’s Mission – Senior Housing Expansion
11	Volunteers of America Western Washington - Fair Housing Education and Counseling Services
12	Homage Senior Services - Minor Home Repair Program
13	Town of Darrington – Madison Avenue Waterline
14	Darrington Food Bank – Darrington Food Bank Expansion Project
15	Housing Authority of Snohomish County (HASCO) - Alpine Ridge Utility Improvement Project
16	Housing Hope Properties – Everett UCC (AKA Rainbow Terrace)
17	Quilceda Community Services - Quilceda Community Village
18	Housing Hope Properties – Scriber Point
19	City of Everett – Tenant Based Rental Assistance (TBRA)
20	CDBG Planning & Administration
21	HOME Planning & Administration
22	City of Everett - Housing Hope Properties – Everett UCC (AKA Rainbow Terrace)
23	YWCA of Seattle-King-Snohomish County - Pathways to Stability TBRA Program
24	Housing Hope Properties - CHDO Operating Support Grant
25	City of Everett - Community Housing Improvement Program (CHIP)
26	Parkview Services – Parkview Homeownership Assistance
27	HomeSight – Homebuyer Assistance

Table 53 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The allocation priorities for these activities are according to the allocation priorities set forth in the

Strategic Plan of the 2025-2029 Consolidated Plan. See SP-25 for more information.

The number of activities that may be undertaken are limited by the amount of CDBG, HOME, and ESG funds available.

AP-38 Project Summary
Project Summary Information

1	Project Name	ESG Rapid Rehousing, Emergency Shelter, HMIS, and Grant Administration
	Target Area	
	Goals Supported	ESG Homeless Emergency Shelter ESG Homeless Rapid Rehousing Grant Planning and Administration Homeless Management Information System
	Needs Addressed	Homeless Shelter, Rapid Rehousing, and HMIS Grant Planning and Administration
	Funding	ESG: \$287,596
	Description	Rapid Rehousing (RRH) housing search and stabilization services and tenant-based rental assistance to rapidly re-housing homeless individuals and families into permanent housing. Emergency shelter (ES) facilities operating costs and supportive services. Homeless Management Information System (HMIS) costs for required data collection and reporting activities. County administration costs for required grant administration activities.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 25 households who are extremely low-income and homeless (residing in emergency shelters, places not meant for human habitation, or fleeing domestic violence) will receive rapid rehousing assistance through Catholic Community Services Western Washington. Approximately 340 homeless households (715 persons) will be served in emergency shelter facilities operated by Cocoon House, Domestic Violence Services of Snohomish County, Housing Hope, and the YWCA. N/A for HMIS and Grant Administration.
	Location Description	Rapid re-housing is provided at scattered sites throughout the county. Emergency shelters are located in Everett, Lynnwood, Monroe, and Stanwood and a confidential location for the domestic violence shelter.

	Planned Activities	<p>Rapid rehousing households will be provided with housing search, placement, and other assistance, including supportive services, and short- and medium-term rental assistance under a graduated rental subsidy to ensure housing stability prior to exit. Persons served through emergency shelter facilities will receive safe shelter with supportive services, connection to resources, and other essential services. HMIS activities include data entry, data quality, and reporting. Eligible grant administration costs include: 1) overall program management, coordination, monitoring, and evaluation, 2) providing training on ESG requirements, 3) preparing and amending the ESG and homeless-related sections of the Consolidated Plan, and 4) carrying out required environmental review responsibilities. The allocated cost for ESG Administration falls within the allowed rate of 7.5% of the 2025 ESG allocations.</p> <p>Of the \$287,596 in 2025 ESG funding, \$115,156 is allocated for rapid rehousing, \$120,500 for emergency shelter, \$21,568 for ESG administration, and \$30,372 for HMIS.</p>
2	Project Name	Catholic Community Services - Pregnant and Parenting Housing Program
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: \$68,854
	Description	The project will provide supportive housing with case management services to homeless adults who are pregnant, parenting, or in verifiable reunification with their children who are currently in chemical dependency treatment or have been in treatment within the past year. The overall goal is to reduce homelessness, increase self-sufficiency, and move households towards permanent housing.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 homeless adults who are pregnant, parenting, or in verifiable reunification and their children, for a total of approximately 60 persons.
	Location Description	1918 Everett Avenue, Everett, WA 98201. County-wide. Housing sites are located at scattered sites in Snohomish County, outside the cities of Everett and Marysville and outside the King County portion of Bothell.
	Planned Activities	It is anticipated that CDBG funds will be used to provide case management services for the program.
3	Project Name	Cocoon House – East Shelter
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: \$53,947
	Description	The project will provide short-term emergency housing and supportive services with the goal of improving outcomes for youth across four domains: stable housing, employment and education, wellbeing, and permanent connections.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 85 homeless teens ages 12 to 17.
	Location Description	County-wide. 15302 Plainview Pl., Monroe, WA.
	Planned Activities	It is anticipated that CDBG funds will be used to provide case management and other support staff.
4	Project Name	Domestic Violence Services of Snohomish County - Domestic Violence Emergency Shelter Advocacy
	Target Area	
	Goals Supported	CDBG Public Services – Non-Homeless Special Needs
	Needs Addressed	Public Services
	Funding	\$47,445

	Description	The project will provide a continuum of services to victims of domestic violence and their children including a 24-hour hotline, community-based support groups, and confidential emergency shelter where participants receive legal advocacy, housing stability, and trauma-informed advocacy to enhance their safety, increase self-sufficiency, and obtain permanent housing.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 adults with their children who are victims of domestic violence who are predominately low- and moderate-income (400 persons).
	Location Description	DVSSC 24-hour Hotline: (425) 259-2827. DVSSC Administrative Offices: (425) 259-2827, P.O. Box 7, Everett, WA 98206. County-wide. Service locations are confidential.
	Planned Activities	It is anticipated that CDBG funds will be used for shelter staff to provide support services and advocacy.
5	Project Name	Housing Hope - Homeless Teen & Young Parent Program
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: \$31,126
	Description	The project will provide a family support coach and a mental health therapist for homeless teen and young adult families. The Specialist provides needs assessment, goal planning, and resource connections leading to permanent housing and family stability.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 57 homeless teens and young adult families.
	Location Description	Agency Office: 2505 Howard Ave., Everett, WA 98201

	Planned Activities	It is anticipated that CDBG funds will be used to pay for a Family Support Coach, Mental Health Therapist, and a Family Support Coach Supervisor.
6	Project Name	Senior Services of Snohomish County DBA Homage - Food and Nutrition Services
	Target Area	
	Goals Supported	CDBG Public Services - Non Homeless Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: \$60,000
	Description	The project will provide home delivered meals for home-bound seniors and people with disabilities; and freshly prepared hot meals at 11 sites.
	Target Date	6/30/26
	Estimate the number and type of families that will benefit from the proposed activities	60 elderly persons and severely disabled adults.
	Location Description	Agency administrative office: 5026 19 th St. SW. Lynnwood, WA 98036. County-wide, 11 meal sites outside the cities of Everett and Marysville.
	Planned Activities	It is anticipated that CDBG funds will be used to provide a portion of the staffing, supply, and operating costs of the program.
7	Project Name	Mercy Housing Northwest - Senior and Disabled Support Services
	Target Area	
	Goals Supported	CDBG Public Services - Non Homeless Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: \$10,220
	Description	The project will provide on-site service coordination, group programming, and one-on-one assistance in health and wellness, housing stability, community involvement, and financial education at two sites.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	30 low-income senior households (35 persons).
	Location Description	Agency administrative office: 2505 Third Avenue, Suite 204, Seattle, WA 98212. Services to be provided at two senior housing properties in Lake Stevens and Snohomish.
	Planned Activities	It is anticipated that the CDBG funds will be used for staffing for a Resident Services Coordinator to provide both group programming and one on one assistance in the areas of health and wellness, housing stability, and community involvement.
8	Project Name	Snohomish County Legal Services - Legal Assistance for Low-Moderate Income Residents of Snohomish County
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	\$40,000
	Description	The project will provide legal advice and representation for people who are low-moderate income who are facing evictions or have debt-related barriers to accessing housing, including manufactured/mobile home park residents.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	200 homeless or imminently homeless persons
	Location Description	Agency administrative office: 2920 Colby Ave., Ste. 102, Everett, WA 98201. Services will be delivered primarily in Everett; at the Snohomish County Courthouse, at the agency's downtown Everett office location, and at community partner agencies in Everett and Snohomish County areas.
	Planned Activities	The CDBG funds are anticipated to be used to provide legal staff and related operating and maintenance costs for the program.

9	Project Name	YWCA of Seattle-King County-Snohomish County - Families in Transition
	Target Area	
	Goals Supported	CDBG Public Homeless - Homeless
	Needs Addressed	Public Services
	Funding	\$140,981
	Description	The project will provide permanent supportive housing combined with intensive, individually tailored, home-based case management and referrals to other community supportive services such as mental health, financial management, employment readiness, and weekly legal clinic.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 42 homeless, low-income, households with disabilities (115 persons in total).
	Location Description	Agency Office: 3301 Broadway Ave, Suite A, Everett, WA 98201. Services provided at 12 permanent supportive housing units in various locations in Snohomish County.
10	Planned Activities	It is anticipated that CDBG funds will be used to provide case management staff and related operating costs of the program.
	Project Name	Senior Housing Expansion - Monroe Gospel Women's Mission
	Target Area	
	Goals Supported	Public Services - Homeless
	Needs Addressed	Public Services
	Funding	\$20,000
	Description	The project will provide housing, food, laundry services, employment assistance, case management, and many other wrap-around services.
	Target Date	6/30/2026

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 80 single senior women experiencing homelessness.
	Location Description	Agency Office: 450 S. Lewis St., Monroe, WA 98272
	Planned Activities	It is anticipated that CDBG funds will be used to pay for staff, counselor and a goals class teacher.
11	Project Name	Volunteers of America Western Washington - Fair Housing Education and Counseling Services
	Target Area	
	Goals Supported	CDBG Public Services - Fair Housing
	Needs Addressed	Public Services
	Funding	CDBG: \$28,375
	Description	The project will provide fair housing education, counseling, and referral services to homeless persons, and to persons, at least 51% of whom are low- and moderate-income, who reside in Snohomish County, outside the cities of Everett and Marysville.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	100 homeless and low- and moderate-income individuals.
	Location Description	Administrative Office at 2802 Broadway, Everett, WA. County-wide, outside the cities of Everett and Marysville.
	Planned Activities	It is anticipated that CDBG funds will be used to provide a portion of the staffing, supply, and operating costs of the program.
12	Project Name	Senior Services of Snohomish County - Minor Home Repair Program
	Target Area	
	Goals Supported	Homeowner Minor Home Repair
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$976,851

	Description	Homage Senior Services (Homage) will use CDBG funds to provide health, accessibility, and safety repairs to 370 homes owned and-occupied by low-income elderly persons and persons with disabilities with incomes at or below 50% of the area median income. Priority is given to households earning at or below 30% of area median income. The program serves homeowners residing in Snohomish County, outside the Cities of Everett and Marysville, and the King County area of Bothell. Snohomish County will use a portion of the funds allocated to this activity for activity delivery costs.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	370 households who are low-income elderly persons and persons with disabilities with incomes at or below 50% of the area median income.
	Location Description	Administrative offices located at 5026 196 th St SW, Lynnwood, WA. Repair Services will be provided County-wide, outside the cities of Everett, Marysville, and outside the King County portion of the City of Bothell.
	Planned Activities	See Project Description Above.
13	Project Name	Town of Darrington- Madison Ave Waterline
	Target Area	
	Goals Supported	Infrastructure 2
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$530,772

	Description	The Town of Darrington (the Town) is requesting CDBG funds for professional services and construction costs associated with approximately 1780 linear feet of 8-inch ductile iron water main to replace a 2-inch PVC piping and 8-inch PVC piping with approximately 53 service hook ups and 2 new fire hydrants. In addition to the ductile iron main there will also be 4 new gate valves. This project will require a 120-foot pavement patch as well. This project will complete a waterline loop and increase fire flow. Snohomish County will use a portion of the funds allocated to this activity for activity delivery costs.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1,465
	Location Description	Madison Avenue – Seeman Street south to Darrington Street – hookup only, Hickey Street - Commercial Avenue west to end of Hickey Street, Commercial Avenue – Hickey Street south to end of road – hookups, North Connection between Commercial Avenue and Sauk Avenue, South Connection between Commercial Avenue and Sauk Avenue, Sauk Avenue – North Connection south to South Connection, Darrington, WA. Census designated Low-Mod Place located in Census Tract 053700, Block Group 1 with an LMI of 57.33%
	Planned Activities	See project description above.
	14	
	Project Name	Darrington Food Bank-Darrington Food Bank Expansion
	Target Area	
	Goals Supported	Public Facilities 3
	Needs Addressed	Public Facilities
	Funding	CDBG: \$250,617

	Description	CDBG funds will be used for site improvement, professional services, and construction cost of a 2100 Square foot single level insulated metal pole building on a cement pad with utility service connections and a parking lot. The building will be ADA accessible and will include one roll-up garage door, one framed in unisex bathroom, a kitchen area with a three-sink wash station and dishwasher. The building will be used for dry goods storage and food box assembly. In an emergency or disaster situation, the building would also serve as a food intake and distribution site. Snohomish County will use a portion of the funds allocated to this activity for activity delivery costs.
	Target Date	5/1/2027
	Estimate the number and type of families that will benefit from the proposed activities	14,000 People
	Location Description	1090 Sauk Ave Darrington, WA, 98241
	Planned Activities	See project description above.
15	Project Name	Housing Authority of Snohomish County (HASCO) - Alpine Ridge Utility Improvement Project
	Target Area	
	Goals Supported	Infrastructure 2
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$2,052,560

	Description	Project will provide professional services, soft costs, and construction cost associated with utility replacement and upgrades of approximately 2,229 linear feet of aging sewer, water, and electrical lines at Alpine Ridge Manufactured Home Community in Lynnwood, WA. This will involve digging new trenches throughout the site to lay a new main sewer line in the middle of the street and trenches to each manufactured home to replace the lateral connection to the main line. New electrical will be run from the transformer throughout the site to replace existing site lighting. Alpine Ridge is a homeowner occupied; 55plus, senior affordable manufactured housing community owned by the Housing Authority of Snohomish County (HASCO). Snohomish County will use a portion of the funds allocated to this activity for activity delivery costs.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	145 Households.
	Location Description	17408 44 th Avenue W, Lynnwood, WA. 98037
	Planned Activities	See project description above
16	Project Name	Housing Hope Properties - Everett UCC (AKA Rainbow Terrace)
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordability
	Funding	HOME: \$2,025,400

	Description	<p>The Housing Hope - EUCC (AKA Rainbow Terrace) proposed project is a new construction build and site improvements for a multifamily housing development on approximately 0.384 acres of the southern portion (Phase I) of the total 0.64-acre of three parcels located at 2624 Rockefeller Ave, Everett, WA 98201. The subject site is owned by Everett Avenue Senior Housing LLLP and the land acquisition closed July 31st, 2024. Housing Hope Properties is currently the sole member of this Partnership and plans to remain as the Managing Member once the Investor Member is admitted at finance closing.</p> <p>The proposed EUCC project, will be a senior-focused development to include one 7-story multifamily residential building totaling approximately 57,653 SF with tenants having the ability to age-in place to the greatest extent possible. The building would be approximately 56,272 gross square feet for Residential use and 1,381 gross square feet for Non-Residential use. The total dwelling units will offer 60 units of 1 bedroom / 1 bath (536 SF), and 6 units of 2 bedroom / 1 bath (742 SF) configurations.</p> <p>On-site administration will provide supportive services and include spaces such as a lobby, staff offices, meeting rooms, health consultation space, multipurpose room with a residential-grade kitchen for life-skills programs attended by the residents, a central laundry area, package/mail room, property maintenance, and storage / mechanical spaces. Site improvements to include +/- 26 parking spaces (8 new stalls and 18 existing stalls; zoning requirement is for six (6) parking spaces in total for staff and visitors only), a courtyard with picnic and table game areas, a companion animal area, possible garden areas, landscaping, and buffers, stormwater drainage and management, with utilities to accommodate the project. The Non-Residential space is planned potentially for retail that includes it being proposed for the Housing Hope Kindred Kitchen store.</p>
	Target Date	10/31/2027

	Estimate the number and type of families that will benefit from the proposed activities	The proposed project will consist of a total of 66 units, which will be income and age restricted. The unit mix will consist of one- and two-bedroom units which half will serve senior tenants earning at or below either 30% or 50% of the Area Median Income (AMI). 30 units of the 1-bedrooms and 3 units of the 2-bedroom options will be at or below 30% AMI. 30 units of the 1-bedrooms and 3 units of the 2-bedroom options will be at or below 50% AMI. Additionally, 14 units will be set aside for tenants transitioning from homelessness from the County's Coordinated Entry or coming from the County's Housing Inventory for emergency shelter or shorter emergency bridge housing.
	Location Description	The subject site is located west of the I-5 corridor, and just north of downtown Everett. Consisting of approximately 0.384 acres of the southern portion (Phase I) of an approximate total 0.64-acre on three parcels located at 2624 Rockefeller Avenue in Everett (Parcels: 00562461102500; 00562461102100; 00562461101800). The remaining portion of the three parcels will be approximately 0.256 acres and will be a separate project (Phase II) to be determined later but planned to be complementary to this project and support additional low-income populations.
	Planned Activities	The proposed project may include demolition, refinancing of bridge loans, new construction, site improvements, and/or related development activities. The anticipated number of HOME-Assisted Units is estimated to be three (3) units.
17	Project Name	Quilceda Community Services - Quilceda Community Village
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordable Housing
	Funding	HOME \$152,693.70

	Description	<p>The Quilceda Community Village (QCV) proposed project is a new construction build and site improvements for a Permanent Supportive Housing project with twelve (12) cottage style dwelling units and a communal building to be placed at 9610 48th Dr NE, Marysville, WA 98270. The subject site is owned by Quilceda Community Services (QCS)</p> <p>The QCV project unit is planned to house fifteen (15) very-low- income individual households with 30% Area-Median-Income (AMI) or below. The proposed project plan is to create affordable housing where people with intellectual and/or developmental disabilities (I/DD) can safely age in place with maximized self-sufficiency, quality of life, and inclusion in the greater community.</p>
	Target Date	6/01/2028
	Estimate the number and type of families that will benefit from the proposed activities	The project is planned to house fifteen (15) very-low-income individual households with 30% Area-Median-Income (AMI) or below. QCV's tenants are planned to earn less than 20% of AMI; all tenants of QCV will be at or under 30% AMI.
	Location Description	The proposed project to be placed on an approximately 44,500 square feet site (1.022 acres) located at 9610 48th Dr NE, Marysville, WA 98270.
	Planned Activities	The proposed project may include new construction, site improvements, and/or related development activities. The anticipated number of HOME-Assisted Units is estimated to be one (1) unit.
18	Project Name	Housing Hope Properties – Scriber Place
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordable Housing
	Funding	HOME \$1,600,000

	Description	<p>Housing Hope Scriber Place (HH SP) proposes site and building improvements for a new multifamily housing development on a 2.20-acre parcel located at 19200 56th Ave. W. in Lynnwood.</p> <p>The project will involve the new construction of 52 units on a level, vacant site (used as a baseball field), in one 2-story and three 3-story multifamily residential buildings totaling approximately 53,944 SF. The 52 total dwelling units offer 9 units of 1 bedroom / 1 bath (659 SF), 25 units of 2 bedroom / 1 bath (830-888 SF), 12 units of 3 bedroom / 2 bath (987 SF) and 6 units of 4 bedroom / 2 bath (1,280 SF) configurations.</p>
	Target Date	July 1, 2026
	Estimate the number and type of families that will benefit from the proposed activities	At project completion, 26 units within the Scriber Place project will be affordable to households at or below 30% of area median income (AMI), and the remaining 26 units affordable to households at or below 50% of AMI, with six (6) of these units dedicated to serving households with histories of substance abuse. The anticipated number of HOME-Assisted Units is estimated to be eight (8) units.
	Location Description	located at 19200 56th Ave. W. in Lynnwood (Parcel B, APN 00585300004300). The subject site is located west of Edmonds School District (ESD) Cedar Valley Community School campus, north of 194th St SW and east of 58th Pl W, in the City of Lynnwood, Snohomish County, in the State of Washington.
	Planned Activities	The project may include acquisition, refinancing of bridge loans, new construction and/or related development activities.
19	Project Name	City of Everett – Tenant Based Rental Assistance
	Target Area	
	Goals Supported	Tenant Based Rental Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME \$100,000

	Description	These funds will provide tenant based rental assistance to include security/utility deposits and/or monthly rent payments. Eligible households include low-income households living in the City of Everett earning at or below 50% Area Median Income. Priority should be given to those households that have demonstrate economic hardship.
	Target Date	12/31/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 8 households earning at or below 50 percent area median income will be served by these funds. 8 households assisted up to 12 to 24 months.
	Location Description	City of Everett and the Urban Growth Area
	Planned Activities	Tenant Based Rental Assistance
20	Project Name	CDBG Planning & Administration
	Target Area	
	Goals Supported	Grant Planning and Administration
	Needs Addressed	Grant Planning and Administration
	Funding	CDBG: \$667,930
	Description	Funds will be used by Snohomish County to provide general management, oversight, and coordination of CDBG grant program.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	3000 Rockefeller Ave, Everett, WA 98201

	Planned Activities	Eligible costs include project selection process, contract development and management, monitoring, reporting and other compliance activities, engaging in citizen participation and consultation process, evaluating program performance, fulfilling program audit obligations, development of consolidated plan and annual action plan and other consolidated planning and reporting requirements, fair housing, and other eligible planning and administration activities. The cost of planning and administration activities falls within the allowed rate of 20% of 2025 CDBG allocation and PY 2025 CDBG program income. PY 2025 program income is estimated at this time. An additional allocation of 20% of any PY 2025 CDBG program income remitted to the County in excess of the estimated amount is also allocated to this activity, contingent upon receipt.
21	Project Name	HOME Planning & Administration
	Target Area	
	Goals Supported	Grant Planning and Administration
	Needs Addressed	Grant Planning and Administration
	Funding	HOME: \$180,299
	Description	Funds will be used by Snohomish County to provide general management, oversight, and coordination of the HOME grant program.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	NA
	Location Description	3000 Rockefeller Avenue, Everett, WA 98201.

	Planned Activities	Eligible costs include project selection process, contract development and management, monitoring, reporting and other compliance activities, engaging in citizen participation and consultation process, evaluating program performance, fulfilling program audit obligations, development of consolidated plan and annual action plan and other consolidated planning and reporting requirements, fair housing, and other eligible planning and administration activities. The cost of planning and administration activities falls within the allowed rate of 10% of 2025 HOME allocation and PY 2025 HOME program income. An additional allocation of 10% of any PY 2025 HOME program income remitted to the County in excess of the estimated amount is also allocated to this activity, contingent upon receipt.
22	Project Name	City of Everett – Housing Hope Properties – EUCC Rainbow Terrace
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordable Housing
	Funding	HOME \$203,629
	Description	Project will create a total of 66 new residential units for seniors aged 55 and above. 33 of the units will be affordable to low income households living earning at or below 30% Area Median Income and 33 units will be affordable to those earning at or below 50% AMI. Sixty (60) units are one-bedroom and 6 are two-bedroom units.
	Target Date	12/31/2027
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1 HOME unit 1 for low-income seniors aged 55 and above.
	Location Description	2624 Rockefeller Ave Everett, WA 98201
	Planned Activities	New Construction
23	Project Name	YWCA of Seattle-King-Snohomish County - Pathways to Stability TBRA Program

	Target Area	
	Goals Supported	Tenant-Based Rental Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME: \$100,000
	Description	These funds will provide tenant based rental assistance to include security/utility deposits and/or monthly rent payments. Eligible households include low-income households living in the City of Everett earning at or below 30% or 50% Area Median Income. Priority should be given to those households that have demonstrate economic hardship.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 85 households earning at or below 50 percent area median income will be served by these funds.
	Location Description	YWCA office location: 3301 Broadway Ave, Suite A, Everett, WA 98201. Units assisted: Scattered sites, county-wide.
	Planned Activities	Assistance with security deposits, utility deposits, and other HOME-eligible tenant-based rental assistance costs.
24	Project Name	Housing Hope Properties - CHDO Operating Support Grant
	Target Area	
	Goals Supported	CHDO Operating Support
	Needs Addressed	Affordable Housing
	Funding	HOME: \$90,149
	Description	This is a Community Development Organization (CHDO) operating support grant to sustain a portion of the organization's operating expenses. Examples of such costs include staff salaries, benefits, training, and administrative support.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	One CHDO Organization

	Location Description	Administrative Office located at 5830 Evergreen Way, Everett, WA 98203.
	Planned Activities	
25	Project Name	Everett - Community Housing Improvement Program (CHIP)
	Target Area	
	Goals Supported	Homeowner Home Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: \$226,608.09
	Description	Program will provide low-interest loans to low- and moderate-income homeowners with incomes at or below 80% of the area median income to rehabilitate single family homes. Additional program income to be collected by this program through the end of the 2024 program year is also allocated to this activity, contingency upon receipt.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 5 households earning at or below 80 percent area median income will be served by these funds.
	Location Description	City of Everett office is located at: 2930 Wetmore Avenue, Suite 8-A, Everett, WA 98201. Scattered sites within City of Everett and the Urban Growth Area.

	Planned Activities	Major rehabilitation improvements to single family homes (can include, but not limited to, roof repair/replacement, plumbing repair, interior improvements, foundation repair). Assistance is provided in the form of deferred payment loans to homeowners for 15 to 25 years, which accrue at 3% simple interest. Loan amounts typically range between \$5,000 and \$100,000, with an average loan of \$45,000. The CHIP program construction inspectors write a detailed bid specification for competitive bidding and monitor the program at no additional charge. Program income generated from loan interest payments and repayment of loans is used to provide additional loans under the program.
26	Project Name	Parkview Services – Parkview Homeownership Assistance
	Target Area	
	Goals Supported	First-Time Homebuyer Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME 745.19

	Description	Project will provide purchase assistance to one (1) low-income first-time homebuyer where at least one member of the household has a permanent disability as defined by the Americans with Disabilities Act of 1990. Assistance will be provided through second or third mortgages up to \$50,000 per household at zero percent interest with no monthly or annual payments. Repayment would be due at time of resale, refinance, or transfer of property. Recaptured funds including amount of purchase assistance, and any shared appreciation will be used to provide additional loans to future low-income first-time homebuyers. Assistance will be provided to households with incomes at or below 80% of the area median income (AMI); it is anticipated that some households served will have incomes at or below 50% of the AMI. Parkview Services will also provide homebuyer education and housing counseling services to participants with other funds. Funding amount reflects actual \$745.19 in PY 2024 HOME program income. Any additional HOME PI collected through the end of 2024 PY will be allocated to this activity contingency upon receipt.
	Target Date	6/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	1 household with income at or below 80% of the area median income.
	Location Description	Scattered sites county-wide outside the cities of Everett and Marysville, and the King County portion of Bothell.
	Planned Activities	See project description above.
27	Project Name	HomeSight – Homebuyer Assistance
	Target Area	
	Goals Supported	First-Time Homebuyer Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME PI \$35,612.76

Description	Provide purchase assistance to low- and moderate-income first-time homebuyers. Assistance will be provided through second or third mortgages up to \$50,000 per household at three percent deferred interest for 30 years with no monthly or annual payments. Repayment would be due at the time of resale, refinance, or transfer of property. Repaid funds including the amount of purchase assistance and any shared appreciation will be used to provide additional loans to future first-time homebuyers under the program. Assistance will be provided to households with incomes at or below 80% of the area median income; it is anticipated that some households served will have incomes at or below 50% of the area median income. HomeSight will also provide homebuyer education and housing counseling services to participants with other funds. Funding amount reflects \$35,652.76 in actual PY 2024 HOME program income. Any additional HOME PI collected through the end of the 2024 PY will be allocated to this activity, contingency upon receipt.
Target Date	6/30/2026
Estimate the number and type of families that will benefit from the proposed activities	1 household with incomes at or below 80% of the area median income.
Location Description	Scattered sites county-wide outside the cities of Everett and Marysville (CDBG only), and the King County portion of Bothell. HomeSight office is located at 5515 Rainier Avenue South, Seattle, WA 98118 206-760-4223 https://homesightwa.org
Planned Activities	See project description above.

The 2025 projects funded with Snohomish County Consortium CDBG, HOME, ESG and HOME and CDBG program income funds will serve the following geographic areas:

- A program providing minor home repairs for elderly persons and persons with special needs and

serves households Consortium-wide.

- Two programs providing homeownership assistance to first-time low-and moderate-income homebuyers and serve households Consortium-wide.
- A program providing homeowner home rehabilitation will serve households in Everett and the Everett Urban Growth Area.
- Two infrastructure projects, one waterline improvement project is located in the Town of Darrington and one rental housing infrastructure project located in Lynnwood.
- Public services, rapid rehousing, and emergency shelter projects generally serve people Consortium-wide.
- Three rental housing projects located in the Cities of Everett, Lynnwood and Marysville.
- One public facility improvement to a food bank located in the Town of Darrington.

Geographic Distribution

Target Area	Percentage of Funds
NA	

Table 54 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Because the needs addressed by the Snohomish County Consortium exist throughout the county, the investment of CDBG, HOME, and ESG funds for housing and non-housing community development projects likewise support projects in locations throughout the county. Some projects benefit specific areas of the county, while others provide county-wide benefits. CDBG public facility and infrastructure projects that benefit all residents of an area, such as streets, sidewalks, water/sewer systems, and parks, serve areas that consist predominately of low- and moderate-income households. Based on current HUD criteria for Snohomish County Consortium areas outside the City of Everett and the City of Marysville, these are areas where at least 50.53% of the households are low- and moderate-income income, with the percentages updated by HUD. In addition, pursuant to an interlocal agreement, 21% of HOME funds received each year are set-aside for affordable housing projects selected by the City of Everett. These projects benefit residents of the City of Everett, with some projects also benefiting residents of the City of Everett's Urban Growth Area.

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The following is a summary of the one-year goals for Snohomish County Consortium CDBG, HOME, and ESG affordable housing activities in the 2025 program year. Activities include rehabilitation and construction of new rental housing, homeowner home repair and rehabilitation, first-time homebuyer purchase assistance, and rapid re-housing rental assistance.

One Year Goals for the Number of Households to be Supported	
Homeless	118
Non-Homeless	19
Special-Needs	371
Total	508

Table 55 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	118
The Production of New Units	13
Rehab of Existing Units	375
Acquisition of Existing Units	2
Total	508

Table 56 - One Year Goals for Affordable Housing by Support Type

Discussion

For the 2025 Annual Action Plan, it is estimated that Snohomish County Consortium 2025 CDBG, HOME, and ESG projects will provide affordable housing to 118 renter households and 377 homebuyer and homeowner households. Of the 118 renter households, it is estimated that 107 will be extremely low-income and 11 will be low-income. Of the 377 homebuyer and homeowner households, it is estimated that 240 will be extremely low-income, 135 will be low-income, and 2 will be moderate-income.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The Everett Housing Authority (EHA) and the Housing Authority of Snohomish County (HASCO) administer HUD Section 8 Housing Choice Voucher programs that provide rental assistance to very low-income and extremely low-income households in Snohomish County. In addition to these activities, information is provided below on other actions planned by EHA and HASCO in the upcoming year to address the needs of assisted housing and to encourage assisted housing residents to become more involved in management and participate in homeownership.

Actions planned during the next year to address the needs to public housing

Everett Housing Authority (EHA): Key initiatives to ensure the long-term availability of subsidized and affordable housing and improve the housing services to EHA's clients and those of its partners include the following:

EHA has been admitted to HUD's Moving to Work (MTW) Demonstration program as part of a cohort studying rent reform. EHA completed a year-long enrollment campaign to enroll all non-elderly, non-disabled households in the six-year rent study in Q1 of 2024 and are now beginning its third year administering the rent study. The purpose of the study is to test a new tier-based rent setting model that is hoped to reward employment and decrease administrative burden for staff.

EHA will pursue the following activities to ensure the long-term availability of subsidized and affordable housing in Everett:

1. Continue planning for the demolition of remaining units in the Baker Heights neighborhood during calendar year 2025, subject to any required HUD approval, permitting, and design/construction logistics. This activity is in preparation for development of a new mixed-income mixed-use community, the Park District, on the remaining acreage of the Baker Heights site. This new development will encompass as many as 1,500 residential units, parks, commercial spaces, and other community amenities to be built in phases.
2. Pursue design and permitting processes for Benjamin Young Senior Apartments, a new development for seniors with transportation and service proximity that anticipates up to 140 units and exterior amenity space. In the program year, EHA may enter into an Agreement to Enter into a Housing Assistance Payments Contract (AHAP) for a portion of the units with Project Based Vouchers which may be designated for low-income seniors.
3. Work in partnership with Sno-Isle Libraries for a joint development partnership in the Mariner community. In conjunction with this partnership, EHA has acquired land near the future 128th St SW Light Rail station and is undergoing development plans for a mixed use, transit-oriented Development (TOD) project including but not limited to library, civic amenities, and affordable

housing uses.

4. Over the course of 2025-2026 EHA may consider making other PBV commitments in support of its Five-Year Plan objective to target populations whose needs have either been neglected or will grow substantially in the next decade, including but not limited to households with children, especially homeless families, and elderly households and individuals.
5. EHA will continue to spearhead advocacy efforts at the city, county, state, and federal levels to expand housing opportunities within EHA's jurisdiction for extremely low-income families with children, in partnership with local non-profits (e.g., Housing Consortium of Snohomish County) and agencies, with a focus on policy development and allocation of resources.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

HASCO plans to undertake the following activities to encourage its program residents to become more involved in management and participate in homeownership programs:

1. Continue to have a resident Commissioner on its six-member Board of Commissioners, which provides an important voice on the Board and represents the interests of residents.
2. Continue to have a Resident Advisory Board to assist in the development of the annual Public Housing Agency Plan.
3. Continue to print and distribute quarterly newsletters for Section 8 Housing Choice Voucher participants. The newsletters are designed to inform residents of news and updates at HASCO and to provide information on ways residents can become involved in HASCO activities, such as the resident Board Commissioner position and the Resident Advisory Board.
4. Maintain an email contact list that participants may sign up for to receive information about upcoming engagement activities at HASCO and other community agencies.
5. Continue to provide homeownership opportunities at three manufactured housing communities in Snohomish County.
6. Continue to partner with HomeSight to provide purchase assistance and homeownership education and counseling.

EHA plans to undertake the following activities to encourage its program residents to become more involved in management and participate in homeownership programs:

1. Encourage a broad spectrum of program participants to attend regular meetings of the EHA Resident Advisory Board to assist with the development of EHA's Public Housing Agency Plan.
2. Encourage residents of properties with active resident councils to become involved with those councils.
3. Keep residents informed of management activities and other agency updates through the

distribution of newsletters and posts to the agency Facebook page.

4. Continue to maintain an active caseload of Family Self-Sufficiency program participants.
5. Continue partnerships with local agencies, such as Housing Hope, to promote homeownership options.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable.

Discussion

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

This section summarizes the goals and activities that will be undertaken to carry out the homeless strategy outlined in SP-60 Homeless Strategy in the Strategic Plan of the 2025-2029 Consolidated Plan and to serve the housing and supportive service needs of persons who are not homeless but have other special needs.

Actions identified to carry out the homeless strategy are anticipated to minimize the impact on those currently experiencing homelessness, to continue progress towards ending homelessness, and to meet the multifarious needs with tailored services that support transition from homelessness into stable housing and increased self-sufficiency. The strategies and goals address the services that are needed to help people avoid becoming homeless in the first place and to prevent repeat episodes of homelessness. The goals also include local efforts to coordinate services for persons who are exiting from institutions of care. When packaged together, these goals support the creation of a high performing response and intervention system to address the complexities of coordinating with various systems of care and provide a vast array of services required to meet needs.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

The Snohomish County Human Services Department works with key stakeholders to meet the goal of effectively engaging those experiencing homelessness and reduce their barriers to housing. The Outreach Coalition (OC) provides a venue for cross-system collaboration with a variety of organizations to identify and locate those experiencing homelessness and coordinate outreach and engagement efforts. Organizations that participate in the OC include homeless housing service providers, PATH, programs serving homeless youth, providers of Behavioral Health services, social service professionals embedded in law enforcement and EMS/Fire Service, Veterans Affairs, municipal employees, and tribal partners. Examples of local outreach efforts includes:

- Co-responders (social service professionals embedded with law enforcement or Fire/EMS Services) identify and locate individuals experiencing homelessness, connect them to housing, Behavioral Health, health, and other essential services. Snohomish County, seven cities, local transit and area tribes currently operate co-response programs in partnership with local First Responders.
- The Diversion Center provides space for individuals experiencing homelessness that are identified by co-responders to await inpatient treatment and connection to services. The County will continue to partner with local law enforcement to ensure that unsheltered individuals are assessed/referred to appropriate services that contribute to housing stability.
- The Carnegie Resource Center provides a one-stop resource to connect community members to

homeless housing resources, including Coordinated Entry, employment/education navigation, and other mainstream services.

- Student Support Advocates and McKinney Vento Homeless Liaisons in schools identify homeless/at-risk students and connect households to housing and services.

All unsheltered individuals and families are first assessed using Coordinated Entry (CE) tools and processes. Individuals and families are then connected directly to homeless housing navigators who work with the household to reduce barriers to obtaining housing and/or accessing needed services. Cocoon House also has advocates who are available throughout the county to meet the safety and service needs of unaccompanied minors. Unaccompanied minors are assessed for youth specific services and housing. Unaccompanied young adults ages 18-24 are assisted with specialized supports and are connected to mainstream services and/or housing where appropriate. Youth and young adults are also entered into coordinated entry and assessed with common tools. Tailored supportive services are based upon assessment of need and include mental health and substance abuse services, assistance signing up for mainstream benefits and accessing health care, legal services, and specialized services for specific populations. Navigators increase the likelihood that chronically homeless and vulnerable homeless persons access the appropriate services by providing progressive outreach and support when needed.

Addressing the emergency shelter and transitional housing needs of homeless persons.

Coordinated Entry Navigators engage with homeless individuals and households residing in shelters to facilitate referrals to appropriate housing interventions. Coordination with shelters ensures equitable and efficient access to housing and services by shelter residents. A CE Navigator has been assigned to conduct intakes and assessments at the largest single adult men's shelter programs in the County. The County has also invested in Rapid Rehousing (RRH) at three shelters which are operated by RRH staff for the benefit of shelter residents exclusively. These shelters also increase system efficiencies by creating pathways to permanent housing, and thus increasing shelter capacity.

Shelters are provided with rapid rehousing services for shelter residents. State and local funds are prioritized for these interventions and shelter agencies, including shelters that serve families with children and households experiencing domestic violence. County staff provide shelters with technical support when needed to rapidly rehouse households from the homeless system. The County also invests in supported employment opportunities for households with higher service needs, including those who have been unemployed long-term through fostering collaborative partnerships that include mainstream employment services providers.

There are 546 total year-round beds of emergency shelter and transitional housing reported in the 2024 Housing Inventory Chart. The inventory of emergency shelters includes facilities for youth and young adults, families, single men, and single women. There are also emergency motel vouchers and emergency shelter and services for households experiencing domestic violence. Shelter providers have identified permanent housing as the appropriate intervention for most homeless households, so

individuals and families applying to shelter are enrolled in the coordinated entry system so that they can be placed in permanent housing as quickly as possible. There were 2,925 year-round beds of permanent housing available in 2024, including 1,483 permanent supportive housing beds, 766 rapid rehousing beds, and 676 other permanent housing beds.

The County is continuing to work with shelter providers and local municipalities to maintain and strengthen the cold weather shelter network. Cold weather shelters open when overnight temperatures are forecasted to be 34° in their local jurisdiction. There are cold weather shelters in Everett, Lynnwood, Marysville, Monroe, and Snohomish. The County is working with the City of Everett and Volunteers of America to identify an additional cold weather shelter location in South Everett. The cold weather season begins in November and lasts through March of the following year. [The Snohomish County Public Safety Hub](#) is updated daily between November and March to show cold weather shelters that are open on any given night.

In addition, the County is expanding shelter capacity for single adults and families by providing funding to local municipalities to administer Motel Vouchers to assist in cities responding to homelessness within their jurisdictions. New shelter capacity through motel vouchers includes:

- New 40 bed shelter for single adults in Everett
- New 6 bed shelter in Marysville
- New 14 bed shelter in Lynnwood
- New 20 bed shelter in Monroe
- New 20 bed units of pallet shelter in Everett for adults without children

In 2022, the County acquired two motels to be transitioned to non-congregate shelters with enhanced services as a bridge to permanent housing. The sites are anticipated to start operating after renovations and refurbishing is completed in 2025. The sites are in two different areas of the county and will provide a range of services tailored to individuals with high needs with 24/7 staffing to support the health and safety of shelter participants.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

All county funded housing agencies utilize the Housing First and Low Barrier Model. The County continues to work with agencies to provide ongoing training and support for Housing First to ensure that homeless households encounter low barriers to accessing housing programs including Rapid Rehousing. The local Rapid Rehousing Guide mandates that no agency providing Rapid Rehousing Services screen households out due to prior evictions, criminal history, or other barriers. The County continues to work with Rapid Rehousing agencies to ensure that they have the technical assistance and skills needed to successfully work with a diverse population of applicants and place them into housing as

quickly as possible. Permanent housing projects and Rapid Rehousing projects will continue to be a priority for funding. The County currently allocates funds to support a flexible fund for use by housing navigators in the Coordinated Entry System and some local shelters to meet the needs of homeless households. These funds allow housing navigators working with homeless households to provide short-term housing assistance and connections with tailored services necessary to resolve the households' immediate housing crisis and maintain housing stability. Funds will continue to be prioritized for more Rapid Rehousing and tailored services connected to the coordinated entry system and to further develop the coordinated entry system of housing and services for young heads of household and unaccompanied youth.

The County has continued its efforts in expanding employment strategies designed to increase capacity and quality of specialized employment services for individuals and families experiencing homelessness or housing instability, and increase employment rates, incomes, and education levels for individuals and families experiencing homelessness or housing instability. Currently, limited employment services are available to provide individualized and supported services to assist adults with multiple challenges to employment to secure and maintain a job and to experience career/wage progression. WA State Department of Social and Health Services Basic Food Employment and Training Program (BFET) and WA State Health Care Authority Foundational Community Supports (FCS) provide funding for these critical services but operating these programs is complex. For this project, the County is providing funding, training, and consultation to increase the number and capacity of local employment agencies to successfully operate quality specialized employment services, using BFET and FCS, for individuals and families experiencing homelessness and housing instability.

Snohomish County will continue to implement and assess the refinement elements in the coordinated entry system for individuals who are residing in institutions of care and meet the HUD definition of homelessness. A Social Security Outreach, Access, and Recovery (SOAR) committee was created and staff trained to ensure those who are eligible for SSI and SSDI to shorten the time span connect participants to these benefits by increasing income helps to facilitate their housing stability By enhancing coordination of service providers and SOAR increases individual's access to the disability income benefits programs administered by the Social Security Administration for eligible adults who are homeless and have a mental illness or a co-occurring substance abuse disorder. Many of the unsheltered homeless population fall into this category.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

The County will continue to work over the next year to streamline coordination between institutions, housing, and services to help prevent those being discharged from institutions from becoming

homeless.

The County has a coordinated homeless prevention system that is accessed through Coordinated Entry. Legal services, dispute resolution services, prevention rental assistance and relocation programs create a continuum of assistance for imminently homeless households. Imminently homeless households are connected to homeless prevention navigators and referred to eviction prevention coordinators who work with the household to identify a strategy for staying housed. They assess for eligibility for the Eviction Prevention program and connect appropriate households with dispute resolution and legal services to prevent eviction. These prevention strategies help households resolve their immediate barriers to housing stability, which can include short term rent assistance, negotiating with landlords, identifying subsequent housing options, relocation cost assistance, and connecting with mainstream services to address issues such as lack of income, employment, or health insurance. Homeless prevention navigators and eviction prevention coordinators have access to a flexible fund to help stabilize housing or increase connection to services or economic opportunities.

The County has allocated Homelessness Prevention funding specifically targeting By And For organizations. By And For organizations are operated by the diverse communities in Snohomish County, serving a population that typically is underserved by Coordinated Entry and the homelessness housing system. The prevention funding assists the County's diverse population by providing grant opportunities to new organizations which have historically not received prevention and homelessness response funding before. This builds capacity at a system level and reaches new ethnic and racial minority groups, immigrants and refugees, and other underserved communities. Snohomish County has contracted with four (4) By And For organizations since August 2023 and has been providing technical assistance to help ensure the agencies have systems and policies in place to serve their communities in new ways, meet funding requirements, and position themselves to apply for other funding opportunities in the future to meet the needs of the populations they work with.

The County's employment efforts also include increasing housing stability for families with young children participating in low-income learning programs. The intent is to assist families in connecting with the Coordinated Entry System or assist them in obtaining/maintaining stable housing by accessing resources and/or flex funds. The goal is that these families will not become literally homeless and will decrease the number of moves they make each year, becoming increasingly more stably housed.

The County will continue to invest in the implementation of a SOARS (SSI/SSDI Outreach, Access, and Recovery) system to ensure that disabled persons, including those are being discharged from institutions, are connected with social security benefits as quickly as possible so that they can have better access to housing opportunities.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

This section provides a summary of the actions the Consortium will take during the upcoming year to reduce public policy barriers that may exist for affordable housing and residential development consistent with SP-55 of the Strategic Plan of the 2025 – 2029 Consolidated Plan. Barriers to affordable housing may exist when the cost of housing or the incentive to develop, maintain, or improve affordable housing are negatively affected by public policies of the jurisdiction. Public policies include tax policies affecting land and other policies, land use controls, zoning ordinances, building codes, fees and charges, and policies that affect return on residential investment.

The local Comprehensive Plans of Snohomish County and Consortium members govern land use and development standards to be in compliance with the State of Washington's Growth Management Act. In coordination with the cities, the County adopted countywide planning policies to provide a framework for regional consistency; all local comprehensive plans must be consistent with the countywide planning policies. Both the Growth Management Act and the countywide planning policies require jurisdictions to plan for a diversity of housing types to meet a variety of needs and to provide housing opportunities for all economic segments of the population.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Consistent with the strategy outlined in SP-55 in the Strategic Plan of the Snohomish County Consortium 2025-2029 Consolidated Plan, in the upcoming 2025 program year, Snohomish County and Consortium members are continuing their commitment to overcoming cost barriers to developing and maintaining affordable housing for low- and moderate-income households through the allocation of a portion of CDBG and HOME funds to help develop and maintain affordable housing and through the goals and objectives outlined in the HART Report and Five-Year Action Plan.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

This section describes the Snohomish County Consortium's planned actions to carry out the following strategies outlined in the Strategic Plan: 1) address obstacles to meeting underserved needs, 2) foster and maintain affordable housing, 3) reduce lead-based paint hazards, 4) reduce the number of poverty-level families, 5) develop institutional structure, and 6) enhance coordination.

Actions planned to address obstacles to meeting underserved needs

The main obstacle to meeting underserved needs is the limited funding available to address all the needs in the community, particularly with sustained funding cuts in several federal, state, and local sources of funding. Snohomish County continues to provide local funding to help address affordable housing needs through its Affordable Housing Trust Fund program and Sales Tax programs.

Snohomish County continues to explore funding opportunities to expand available resources to meet community needs. The Snohomish County Human Services Department continues to participate in various collaborative efforts and partnerships developed to help address underserved needs in the community for low-income persons, homeless persons, and persons with special needs.

As a result of the pandemic, local homeless housing agencies continue to struggle with staff turnover and inability to hire for open positions within their programs, leading to an inability to serve as many clients as they would have been able to if they were consistently fully staffed. They also continue to experience longer times to fill program staff vacancies due to continued impacts of the pandemic on labor market. The County Office of Community and Homeless Services (OCHS) staff meets monthly to review expenditures and unit utilization and follows up with subrecipients as needed to provide technical assistance. Over past few years Snohomish County OCHS has implemented and provided TA to subrecipients on stronger mechanism for spenddown and unit utilization tracking and projections.

Actions planned to foster and maintain affordable housing

The Snohomish County Consortium has awarded CDBG and HOME funds in the 2025 Annual Action Plan to help maintain the existing affordable housing stock in decent and safe condition. This includes funding for a homeowner home rehabilitation program and a homeowner minor home repair program, and improved infrastructure for 145 manufactured homeowner household seniors and persons with disabilities.

Actions planned to reduce lead-based paint hazards

To address the risk of lead-based paint hazards, Snohomish County requires projects and programs funded with CDBG, HOME, and ESG funds it administers to comply with lead-based paint regulations for

rehabilitation work on structures built before 1978. Proposed projects are first reviewed for lead-based paint hazards during the application review process. If the project is selected for funding and lead-based paint is found to be a hazard, project sponsors are required to comply with the applicable federal lead-based paint requirements regarding reduction of the hazard. Funded projects and programs are monitored by Snohomish County Human Services Department staff to ensure compliance with the regulations, such as notification of lead-based paint hazards, performance of work by certified workers according to acceptable procedures, and clearance of the work by certified inspectors. Project sponsors for the homeowner home rehabilitation and homeowner minor home repair programs assess lead hazard risks for homes rehabilitated and repaired under those programs and follow the requirements for homes found to be at risk.

Actions planned to reduce the number of poverty-level families

In order to help reduce the number of poverty-level families, the Snohomish County Human Services Department will continue the various activities outlined in Section [SP-70](#) of the Strategic Plan.

Actions planned to develop institutional structure

Key strengths in the Snohomish County Consortium institutional structure continue to be the existence of a broad range of project sponsors for affordable housing and non-housing community development projects (public facilities, infrastructure improvements, public services), two public housing authorities, ongoing local government and resident input through the Snohomish County Consortium Technical Advisory Committee and Policy Advisory Board, local community planning processes particularly around housing and homelessness, and the collaborative partnerships between the County, local governments, Everett/Snohomish County Continuum of Care, public agencies, private non-profit organizations, and faith-based organizations to address local housing and non-housing community development needs for low- and moderate-income persons.

The Snohomish County Housing Affordability Regional Taskforce (HART) Report and Five-Year Action Plan was created by County Executive Dave Somers to bring together elected leaders from cities across Snohomish County and the County Council, on the belief that the housing affordability challenge before us is intensifying and is best addressed collaboratively and proactively. The County will continue to collaborate with the housing development community to address the community capacity to develop, own, and operate affordable housing.

Actions planned to enhance coordination between public and private housing and social service agencies

Planned actions include:

- Continued coordination through participation in various community partnerships and collaborative

efforts,

- Continued coordination by service providers between clients and landlords,
- Continued operation of Fair Housing program to assist renters being denied housing,
- Continued operation of landlord engagement efforts to increase the capacity of service providers to engage with landlords in an effort to increase access to housing for renters with problematic rental histories and other barriers to entering the housing market,
- Continued encouragement of coordination between housing and service providers, where applicable, through the County's affordable housing application process,
- Continued implementation of the refinements strategies for the coordinated entry and assessment system that provides services to households experiencing a housing crisis, including equitable access to homeless housing resources for eligible households,
- Continued implementation between housing and service providers with mainstream employment services for income progression.
- Continued collaboration through HART's Five-Year Housing Affordability Action Plan, including, but not limited to:
 1. Encourage cities to enter into cooperation agreements with the Housing Authority of Snohomish County (HASCO) and Everett Housing Authority.
 2. Engage private sector partners – large employers, others – in helping to finding solutions to our housing affordability challenge.
 3. Confirm and support an ongoing structure for regional collaboration around production of housing affordable across the income spectrum.

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

This section provides information on Snohomish County Consortium CDBG, HOME, and ESG program-specific requirements for the Annual Action Plan.

For CDBG, the Snohomish County Consortium has selected a three-year overall benefit period to determine compliance with the requirement that at least 70% of CDBG funds are used to benefit low- and moderate-income persons. The three-year period includes the 2023, 2024, and 2025 program years.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate-income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Not applicable. Snohomish County does not intend to use HOME funds for forms of investment other than those described in 24 CFR 92.205 in the 2025 program year.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

HOME funds are limited to gap financing. Subsidy layering and/or underwriting must demonstrate that there are no more HOME funds invested, alone or in combination with other funds, than are necessary to provide quality, affordable, and financially viable housing for at least the duration of the affordability period. The Maximum HOME subsidy per household may not exceed \$50,000.

Two subrecipients in the 2025 Action Plan, HomeSight and Parkview Services, will provide purchase assistance to first-time homebuyers who are Low- and moderate-income and will use the shared appreciation model as stated in the "Snohomish County HOME Homebuyer Program Guidelines for Recapture," **Appendix 1 to AP-90**.

Homebuyers are required to receive housing counseling before receiving HOME assistance to understand the HOME requirements and restrictions.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

Recapture provisions are triggered when, during the period of affordability, the housing ceases to be the principal residence of the buyer who was assisted with HOME funds. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and are enforced via lien, deed restrictions, or covenants running with the land. The recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability.

To ensure investments provide affordable housing over the long term, the housing must be the principal residence of a low-income household throughout the period of affordability. Funding agreements will define the term of affordability. Affordability requirements will be recorded on the property through:

- A deed restriction or covenant running with the land, or

- Loan documents.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not applicable. Snohomish County does not intend to use HOME funds for this purpose in the 2025 program year.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not applicable.

AP-90 Emergency Solutions Grant (ESG)

Reference 91.220(I)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

Emergency Solutions Grant written standards are attached as Appendix 2 to AP-90. They are included as part of the Continuum of Care written standards.

2. If the Continuum of Care (CoC) has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordinated Entry (CE) is a process for people who are homeless or at-risk of homelessness to access homelessness prevention, housing, and/or other supportive services. CE incorporates uniform assessment, prioritization program matching, and connections to mainstream services to help those seeking housing and services to access programs more efficiently.

CE Navigators work with individuals and families to address their current housing crisis and immediate barriers to housing stability by providing direct referrals to tailored services by CE service partners. Tailored Services, include landlord dispute resolution, family mediation, civil legal assistance, mental health and substance use disorder services, and employment and job training programs. By providing these referrals, Navigators assist individuals and families to identify and resolve their immediate barriers to housing stability and retention.

Homeless housing vacancies are filled according to Orders of Priority adopted by the Partnership to End Homelessness Continuum of Care (CoC) Board. Prioritization is based on the length of time an individual or family has resided in a place not meant for human habitation, or an emergency shelter *and* the severity of the individual's or family's service needs. These Orders of Priority have been adopted to ensure that the community's most vulnerable individuals and families are housed as quickly as possible.

Consistent with federal and state guidance on evidence-based practices, Snohomish County's CoC has adopted a low-barrier Housing First approach and is expanding implementation to all levels of the homeless housing and service system. A core principle of Housing First is the belief that all people are ready for housing. Housing First means that no individual or family is denied housing because of challenges with sobriety or substance use, poor credit, or financial history, or have past criminal justice involvement. Instead, safe, and stable housing is viewed as the first step in meeting challenges and provides individuals and families with a foundation on which they are then able to address barriers to housing stability. Housing First also creates efficiencies in the homeless housing system by providing pathways to permanent housing for chronic users of costly emergency response, health care, behavioral health, and other social services.

Client choice is an essential to Housing First. Households are more likely to maintain housing stability when they have a choice in housing and services. Service providers engage households by providing meaningful opportunities to participate in services.

Housing and service providers that use a Housing First approach require a high level of training and skill. Providers must have the ability to serve households with varying needs, including co-occurring mental health and substance use disorders. Wellness and recovery action plans are key components to a Housing First approach. Staff should have access to training on motivational interviewing, crisis intervention, harm reduction, and trauma informed care.

Homeless veterans are served through the veterans' partnership including CE housing and prevention navigation, employment, and other mainstream supportive services. The CE system for veterans connects veterans with the homeless housing intervention that is appropriate to meet their needs as quickly as possible. Rapid Rehousing resources are available for use within the veteran's system through Supportive Services for Veteran Families (SSVF) programs so that homeless veterans have access to permanent housing. Chronically homeless veterans may be served through the Veterans Affairs Supportive Housing (VASH) program or permanent supportive housing programs through the coordinated entry process.

Coordinated Entry (CE) for homeless unaccompanied youth is done through Cocoon House. Cocoon House provides services for young adults ages 18-24 and specialized services for youth under 18 to assist in identifying permanent housing options. Homeless unaccompanied minors who cannot be reunified with their families have access to transitional housing. Youth served in these programs are referred to life skills training and other pre-employment activities such as GED completion, adult basic education and connections to internships, apprenticeships, and/or other job skills programs. Various services are available to help youth increase their life skills and resiliency toward increased self-sufficiency. Young adults, ages 18-24, have access to permanent housing that includes specialized rapid rehousing, other permanent housing, and permanent supportive housing that is largely a set aside within a larger homeless housing project.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations) will be allocated.

- The County conducts a competitive application process for Emergency Solutions Grants (ESG) funds. The County issues a funding notice that is shared with the community via the County's Housing and Community Development and Community Services Continuum of Care distribution lists and is also posted on the County's webpage. An array of organizations are included on the distribution lists: faith-based and non-profit organizations, Snohomish County Consortium, local

governments, public housing authorities, and other organizations. The County staff holds an application workshop for interested applicants.

- County staff conduct a technical review of applications, while the Technical Advisory Committee (TAC) reviews and scores applications using objective criteria. The TAC is made up of city, town, county, and community representatives. The TAC makes funding recommendations to the Policy Advisory Board (PAB).
- The PAB reviews TAC recommendations and makes funding recommendations to the Snohomish County Council. The recommendations are included in the Draft Annual Action Plan that is published for a 30-day public review and comment period.
- The County Council approves the ESG awards as part of the Annual Action Plan approval process. Any comments received during the public review and comment period are considered before approval of the Annual Action Plan.
- Once approved, the Annual Action Plan is submitted to the US Department of Housing and Urban Development (HUD) for a program year start date of July 1 and a contract is executed between HUD and the County for the ESG funds. The County issues award letters and subcontracts with the organizations receiving the funds.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The County meets the requirement in the following ways:

- The CoC Board has five (5) formerly homeless persons as board members. The Board is involved in activities such as setting ESG performance benchmarks, planning priorities, and is consulted on ESG allocations. They are also responsible for the activities under the CoC Program Interim Rule.
- The CoC's Coordinated Entry Advisory Committee (CEAC) meets bimonthly (every other month) to review Coordinated Entry policies and procedures along with assessments and system flows to make continued recommendations for efficiency and improvement. The CEAC actively recruits members with lived experience of homelessness. Currently, 8 of the CEAC members have lived experience of homelessness.
- The County's Human Services Department is a Community Action Agency, and as such, is responsible for a Low Income Needs Assessment, which includes interviewing people who are

experiencing homelessness or are at-risk of homelessness. The Low Income Needs Assessment is used in the Consolidated Plan and in CoC planning to provide input on the needs of persons who are homeless or at-risk of homelessness, in addition to other low-income population needs.

- Information is gathered on needs during the Annual Point-in-Time count through a survey tool. The input and information gathered from individuals through these methods helps define planning and policy, in addition to the participation of homeless/formerly homeless person on the CoC Board which makes recommendations for certain funding and influences homeless policy.

5. Describe performance standards for evaluating ESG.

The County's CoC and Homeless Management Information System (HMIS) staff developed ESG performance standards as part of the process of complying with the new ESG and CoC Interim Rules in consultation with the ESG agencies and CoC. The performance standards included:

- Emergency shelter projects reducing their length of stay by 10% per year until the length of stay is less than 20 days and increasing their rate of exit to permanent housing by 20% per year until the rate is 80%.
- Rapid rehousing projects increasing the percent of participants who are housed in less than 14 days by 20% per year and decreasing the number of participants who return to homelessness 6 months after a successful exit to permanent housing by 5% per year until the rate is less than 15%.

The CoC Board has a standing committee – the Data and Analysis Committee – which proposed specific performance benchmarks for the CoC. The FY2024 Performance Measures approved by the CoC:

1. Reduce the average length of time persons remain in homeless housing projects by 20%: Goal – Less than 20 days.
2. Returns to homelessness:
 - a. Reduce returns to homelessness within 12 months by 20%: Goal – Less than 5%
 - b. Reduce returns to homelessness within 6 months by 20%: Goal – Less than 5%
3. Increase percentage of households who exit to permanent housing by 20%: Goal – 80%
4. Maintain percentage of households who remain in *permanent supportive housing* or *other permanent housing*: Goal – Greater than 90%
5. Increase the percentage of adults who increase their total income from enrollment to exit by 20%: Goal – Greater than 75%
6. Reduce the average number of days for households to move into permanent housing (*permanent housing* and *permanent supportive housing*) by 10%: Goal - Less than 14 days.

In addition, the Data and Analysis Committee has established population and program type specific benchmarks.

Appendixes

1. Appendix 1 to AP-90: Snohomish County HOME Homebuyer Program Guidelines for Recapture and HOME Policies for Homebuyer Assistance
2. Appendix 2 to AP-90: HEARTH Continuum of Care Program & Emergency Solutions Grant Program Local Standards
3. Appendix 1 to AP-12: Public Comments

Appendix 1 to AP-90: Snohomish County HOME Homebuyer Program Guidelines for Recapture

I. Recapture Provisions

Recapture provisions apply to the use of HOME funds for homebuyer assistance programs. Snohomish County will allow for the use of recapture provisions, as appropriate.

HOME funds are limited to gap financing. Subsidy layering and/or underwriting must demonstrate that there are no more HOME funds invested, alone or in combination with other funds, than are necessary to provide quality, affordable, and financially viable housing for at least the duration of the affordability period. The Maximum HOME subsidy per household may not exceed \$50,000.

To be considered an eligible property, the homes acquired must have a purchase price that does not exceed 95% of the median purchase price for single family housing in the area. HUD establishes the median purchase price limits and these limits can be found on their website: <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/>. The County will provide current and updated limits.

Homebuyers assisted with HOME funds must qualify as low-and moderate-income at the time of purchase.

Recapture provisions are triggered when, during the period of affordability, the housing ceases to be the principal residence of the buyer who was assisted with HOME funds. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer, and are enforced via lien, deed restrictions, or covenants running with the land.

Under recapture, the period of affordability is based on the direct HOME subsidy that enabled the homebuyer to purchase the unit. The recapture period of affordability is outlined in the following table:

Homeownership assistance HOME amount per-unit	Minimum Period of Affordability in years
Under \$15,000	5 years
\$15,000 to \$40,000	10 Years
Over \$40,000	15 Years

The County must be notified of any possible foreclosures or transfers in lieu of foreclosure during the period of affordability to ensure that recapture provisions are followed. The County will recoup any net proceeds from available funds due to foreclosure.

Applicants for HOME funding will need to propose recapture provisions at the time of application for funding and demonstrate how the provisions are consistent with the recapture guidelines.

II. Recapture Guidelines as referenced in 24 CFR 92.254 (5)(ii).

Recapture provisions will be used when the home, purchased using HOME funds as financial assistance that reduces the purchase price for the homebuyer, or as gap financing, is no longer the homebuyer's principal residence during the period of affordability.

The County has selected the following options for recapture of funds under the HOME program:

- Recapture of the entire direct HOME subsidy;
- Reduction in the amount recaptured based on the amount of time during the period of affordability in which the buyer has occupied the home;
- Share of net proceeds (sales price minus loan repayments, other than the HOME loan, and closing costs).

A. Recapture Entire Direct HOME Subsidy Method

The **direct HOME subsidy** is the amount of HOME assistance, including any program income that enabled the homebuyer to buy the unit. The direct subsidy includes downpayment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer.

The County will be responsible for the enforcement of the recapture provisions and will require the subrecipient to obtain the recaptured funds from the homeowner. Recaptured funds must be used by the subrecipient for other eligible HOME activities or returned to the County. The subrecipient is responsible to monitor that the homeowners continue to use the home as their primary residence.

In the event of recapture, Snohomish County or subrecipient shall collect from net proceeds all HOME funds, including outstanding principal, plus interest, plus shared appreciation (as defined in Section II (C)). **Net proceeds** are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs.

In the event that net proceeds are insufficient to repay the HOME funds, the amount to be recaptured shall be any funds remaining after payment of all superior non-HOME debt and closing costs that are subtracted from the sale price of the home. In no event shall the borrower be required to use funds other than net proceeds to repay the HOME Funds.

B. Reduction During Affordability Period

In the event that the homebuyer transfers the property either voluntarily or involuntarily during the period of affordability, the direct HOME subsidy will be reduced on a pro-rata basis for the time the homebuyer has owned and occupied the housing, measured against the required affordability period. The resulting ratio will be used to determine how much of the direct HOME subsidy would be recaptured. The pro-rata amount recaptured cannot exceed what is available from net proceeds. The formula is as follows:

$$\frac{\text{\# of Years Occupied}}{\text{Period of Affordability}} \times \text{Total Direct HOME Subsidy} = \text{Recapture Amount}$$

C. Shared Net Proceeds (shared appreciation)

If the net proceeds are not sufficient to recapture the entire HOME investment or a reduced amount as described above, plus enable the homebuyer to recover the amount of the downpayment and any investment in the form of capital improvements made by the homebuyer since purchase, the County or subrecipient may share the net proceeds:

1. To calculate the amount of net proceeds (or shared appreciation) to be returned:

Divide direct HOME subsidy by the sum of the direct HOME subsidy and the homebuyer's investment, multiply by the net proceeds to calculate the amount of HOME investment to be returned.

$$\frac{\text{Direct HOME Subsidy}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{HOME Recapture}$$

2. To calculate the amount of net proceeds (or shared appreciation) available to the homebuyer:

Divide the homebuyer's investment by the sum of the direct HOME subsidy and the homebuyer's investment, multiply by the net proceeds to calculate the amount of homebuyer investment to return to the homebuyer:

$$\frac{\text{Homebuyer Investment}}{\text{Direct HOME Subsidy} + \text{Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount to Homebuyer}$$

III. Special Considerations for Single-Family Properties With More Than one Unit

- A. If HOME funds are used to assist a HOME eligible homebuyer to acquire one unit in single family housing containing more than one unit, recapture affordability requirements listed on Page 1, apply only to the assisted unit.
- B. If the HOME funds are used to help a HOME eligible homebuyer purchase or acquire one or more rental units along with the homebuyer unit, the HOME rental affordability requirements at 24 CFR 92.252 apply to the rental units.
- C. HOME funds may be used to assist HOME eligible homebuyers through lease-purchase programs for existing housing and for housing to be constructed, but the homebuyer must qualify as a low-income family at the time the lease-purchase agreement is signed.
- D. If HOME funds are used to acquire housing that will be resold to a homebuyer through a lease-purchase program and the housing is not transferred to the homebuyer within forty-two months after the project completion, the rental housing affordability requirements at 24 CFR 92.252 will apply.



Snohomish County, WA

Human Services

HEARTH

The Continuum of Care Program

Emergency Solutions Grants Program

Local Standards

Funded through the

U.S. Department of Housing and Urban Development
McKinney-Vento Homeless Assistance Act as amended

March 2019

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- A – [Income Eligibility Documentation Standards](#)
- B – [Step-by-Step Guide to Compliance with Lead-Based Paint Visual Assessment Requirements](#)
- C – [Violence Against Women Act Written Standards](#)

Attachments

- A – Orders of Priority for Permanent Supportive Housing Beds
- B – Rent Reasonableness Policies & Procedures
- C – Rent Reasonableness Certification
- D – Rental Assistance Agreement

I. Introduction

Snohomish County is the Collaborative Applicant (CA) for the Everett/Snohomish County Continuum of Care. Staff support is provided to the Partnership to End Homelessness (Continuum of Care Board) by the Snohomish County Office of Community & Homeless Services (OCHS). The standards contained within this document shall be applied to all projects funded within the Everett/Snohomish County Continuum of Care. Standards that apply only to subrecipients of Snohomish County will be differentiated by the term “Subrecipient”; all other standards will refer to “recipient.”

Purpose for Standards

The purpose of the *Standards* is to:

- ✓ Provide detail on participant eligibility;
- ✓ Outline the allowable activities; and
- ✓ Provide standards for documenting eligibility.

For Subrecipients of Snohomish County, this document is incorporated into the Specific Terms and Conditions (Exhibit A) of the signed agreement (hereinafter Contract) between the County and its Subrecipient. Local policies and procedures are subject to change at any time.

Overview of the HEARTH Act

The U.S. Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009. The HEARTH Act reauthorizes the McKinney-Vento Homeless Assistance Act of 1987, but with some important changes, including:

- The consolidation of HUD’s competitive grant programs, the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- The revision of the Emergency Shelter Grants Program and renaming it as the Emergency Solutions Grants (ESG) Program;
- The creation of a Rural Housing Stability Assistance Program;
- A change in HUD’s definition of homelessness and chronic homelessness;
- A simplified match requirement;
- An increase in prevention resources; and,
- An increased emphasis on performance.

The HEARTH Act implementation is occurring in stages, including the publication of the following regulations:

❖ Definition of Homeless (Final Rule) Docket No. FR-5333-F-02

This final rule was published on December 5, 2011 and provided the definition of “homeless”, “disability”, and “developmental disability”. Additionally, the rule established clear recordkeeping requirements for verifying eligibility to receive assistance.

❖ **Defining “Chronically Homeless” (Final Rule) Docket No. FR-5809-F-01**

This final rule was effective on January 4, 2016, and HUD expected compliance with this definition for all new admissions as of January 16, 2016. The final rule changed the definition that was in effect in the CoC Program interim rule: key changes included requiring an individual or head of household to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for the last 12 months continuously or on at least four occasions in the last three years *where those occasions cumulatively total at least 12 months*; replacing the term “disabling condition” with “homeless individual with a disability”; and defining an occasion by a break of at least seven nights not residing in an emergency shelter, safe haven, or a place not meant for human habitation. The final rule also established recordkeeping requirements for documenting chronic homelessness.

❖ **Emergency Solutions Grant (Interim Rule) 24 CFR § 576**

The interim rule revises the Emergency Shelter Grants Program and renames it the Emergency Solutions Grants Program to broaden existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and support services to rapidly rehouse homeless people. There is now a greater emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The key changes that reflect this new emphasis are the expansion of the homeless prevention component and the addition of the rapid rehousing assistance component.

❖ **Conforming Amendments to the Consolidated Plan (Interim Rule) 24 CFR § 91**

This interim rule updated the annual action plan requirements, revising the homeless needs narrative to describe the local one-year goals and specific action steps for reducing and ending homelessness. In addition, the ESG narrative section was revised to include new requirements such as written standards for the provision of ESG assistance, performance standards for evaluating ESG activities, and a homeless outreach and consultation strategy.

The annual report requirements were updated to include an evaluation of the jurisdiction’s progress in meeting its specific objectives in reducing and ending homelessness. The ESG narrative section was also revised to include additional reporting information on ESG, including the evaluation of the outcomes for ESG activities measured under the new performance standards developed.

❖ **Homeless Management Information System (Pending)**

❖ **Continuum of Care (Interim Rule) 24 CFR § 578**

The Continuum of Care (CoC) Interim Rule was published on July 31, 2012 and took effect on August 30, 2012. The purpose of the regulation is to:

- ✓ Codify the CoC Planning Process;
- ✓ Return individuals and families who experience homelessness to permanent housing in less than 30 days;
- ✓ Consolidate the Supportive Housing Program (SHP), Shelter Plus Care Program (SPC) and the Section 8 Moderate Rehabilitation Program;
- ✓ Promote a community wide commitment to the goal of ending homelessness;
- ✓ Provide funding to quickly rehouse homeless individuals and families while minimizing trauma and dislocation;

- ✓ Promote access to mainstream benefits;
- ✓ Optimize self-sufficiency;
- ✓ Provide funding to support the CoC structure & process; and
- ✓ Codify the CoC structure & process.

❖ **Rural Housing Stability Assistance Program (Proposed Rule)**

The overall goal of the HEARTH Act is to reduce and ultimately end homelessness by reducing the duration of time people spend homeless and reducing recidivism back into homelessness. Currently, Snohomish County has funding through the Emergency Solutions Grants Program and the Continuum of Care Program to undertake projects that work toward this goal.

II. Program Overviews

a. Emergency Solutions Grants Program

The Emergency Solutions Grants (ESG) Program is designed to respond to crisis and provide emergency assistance to prevent homelessness and enable homeless households to move toward independent living. ESG funds are authorized under the McKinney-Vento Homeless Assistance Act and are intended to help improve the quality of existing emergency shelters for the homeless, make additional shelters available, meet the costs of operating these facilities, rapidly rehouse homeless individuals and families, provide essential services to them, and to prevent homelessness. ESG projects will be required to assist people in moving to permanent housing and reduce the time spent in shelters and on the streets.

Recent changes to ESG funding have further defined the purpose and expanded the breadth of activities and going forward, the funds will be used for a variety of assistance, including: *Emergency Shelter, short- or medium-term Rental Assistance, Housing Search and Placement, and Housing Stability Case Management*. The Homelessness Prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance. The Rapid Rehousing component includes similar services and assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing. The funds under this program are intended to target households who would be unsheltered but for this assistance. Snohomish County is a recipient of HUD ESG Program funds and will administer this award for eligible agencies referred to as Subrecipients.

b. Continuum of Care Program

The Continuum of Care (CoC) Program consists of projects that provide housing and supportive services to formerly homeless individuals and families. The goal of projects funded under the CoC Program is to assist households with attaining and sustaining permanent housing as quickly as possible. In Snohomish County, CoC Program funds are currently used to support various projects, including Transitional Housing, Permanent Supportive Housing, and Rapid Rehousing. In addition to these allowable project components, the interim rule also allows funding to be used to provide, to a limited degree, Prevention.

Snohomish County is the recipient for the majority of the awarded projects under the CoC Program. The County, as the Collaborative Applicant (CA) for the Everett/Snohomish County Continuum of Care, contracts with various non-profit service providers to carry out these projects. These agencies are referred to as Subrecipients. Within the Everett/Snohomish County CoC, some agencies may also have direct contracts with HUD.

Policy on Project Selection

Annually, HUD publishes a Notice of Funding Availability (NOFA) for the CoC Program competition. The County will notify community members and key stakeholders that the application is available and will publish all parts of the CoC Consolidated Application on the Snohomish County website with a deadline for project applications to be submitted to the County. During this competitive process, the County develops objective scoring criteria based on the criteria from the NOFA and local priorities that are consistent with the Federal Strategic Plan to Prevent and End

Homelessness. The Project Review Committee (PRC), an independent body, scores projects locally and recommends projects for inclusion in the application submitted to HUD. The County shall notify project applicants in a timely manner, per the NOFA guidelines, whether the project application(s) will be included in the CoC Consolidated Application submission. If a project is not recommended for funding, the County will notify the project applicant, in writing, of this decision.

These guidelines will be updated as necessary throughout the grant period and will continue to expand and include a variety of project components. The County reserves the right to revise the guideline as deemed necessary and will to the extent practicable or as required by HUD, consult with the Everett/Snohomish County Continuum of Care, ESG subrecipients, CoC recipients/subrecipients, homeless or formerly homeless or other interested parties.

III. Coordination Among Providers

The County and the Continuum of Care have been engaged in planning activities to:

- ✓ Increase systems coordination among the various housing and service providers;
- ✓ Improve access for participants;
- ✓ Better target funding; and
- ✓ Better address the housing and service needs in our community.

The County, CoC and ESG (Sub)/Recipients will coordinate and integrate, to the maximum extent practicable, CoC- and ESG-funded activities as well as other homeless programs within the area covered by the Everett/Snohomish County CoC with other mainstream housing, health, social services, employment, education, and youth programs, including those identified in 24 CFR § 576.400(b) and (c).

a. Coordinated Entry System

The Continuum of Care's Coordinated Entry (CE) system has been developed in accordance with the HUD Continuum of Care Regulations. Participation in this system is mandatory for ESG and CoC (Sub)/Recipients. See the Snohomish County Continuum of Care: [Coordinated Entry Policies and Procedures](#), incorporated herein by reference.

b. Fair Housing and Equal Opportunity

i. Affirmatively Furthering Fair Housing

Recipients shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or handicap; and, shall provide program applicants and participants with information, in writing, on their rights and remedies under applicable federal, state, and local fair housing and civil rights laws. 24 CFR § 578.93(c). Subrecipients shall submit these written materials to the County as requested. The County shall review these documents for potential violations of fair housing laws and shall assist Subrecipients in coming into compliance with this requirement. If the County encounters a condition or action that impedes fair housing choice, the County shall work with the applicable jurisdiction(s) that provided the Certification of Consistency with the Consolidated Plan to address and remedy the violation(s). 24 CFR § 578.93(c)(2).

ii. Integration and Accessibility

Housing and supportive services must be offered in an integrated manner, such that persons with disabilities may enjoy a meaningful life within the community. See *Olmstead v. L.C.* (527 U.S. 581 (1999) 138 F.3d 893). Recipients shall offer housing and supportive services to enable individuals with disabilities to interact with nondisabled persons to the fullest extent possible. 24 CFR § 578.93(d). Reasonable accommodations and modifications must be offered when appropriate. See [Reasonable Accommodations and Modifications](#) below.

iii. Reasonable Accommodations and Modifications for Persons with Disabilities

Recipients are required to provide reasonable accommodations and modifications for persons with disabilities. A reasonable accommodation is defined as changing the rules, policies, or services so that a person with a disability has equal opportunity to use and enjoy a dwelling unit or common space. Permitting a person with a disability to have a service animal is an

example of a reasonable accommodation. A reasonable modification is defined as modifying a structure so that a person with a disability has the full enjoyment of the housing and related facilities. Installing a grab bar in the bathroom of a person with a disability is an example of a reasonable modification. For federally-funded housing, the recipient bears the burden of paying for the modification. Recipients must inform applicants during the intake process of their right to request a reasonable accommodation or modification.

iv. Discrimination Based on Household Composition

A recipient receiving funds under the ESG or CoC Programs cannot discriminate against individuals or families based on the composition of the family, the age of any members of the family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. However, housing *may* be limited to families with children who are under the age of 18.

Refer to the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule, “2012 Equal Access Rule,” (77 FR 5662); Equal Access in Accordance With an Individual’s Gender Identity in Community Planning and Development Programs, “CPD Equal Access Rule,” (81 FR 64782); and HUD’s Frequently Asked Question regarding the definition of “family,”

<https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included>.

v. Preventing Involuntary Family Separation

In an effort to maintain family unity, for housing serving families with children, the age and gender of a child under age 18 shall not be used as a basis for denying any family’s admission. 24 CFR § 578.93(e). Additionally, recipients may not deny admission to any member of the family (e.g., 15-year old son).

vi. Equal Access in Accordance with Gender Identity

Recipients must follow HUD’s requirements regarding equal access per the 2012 Equal Access Rule (77 FR 5662) and the CPD Equal Access Rule (81 FR 64782).

Projects, including single-sex emergency shelters, must provide all individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, with access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation.

Recipients’ policies and procedures must reflect that equal access is provided to individuals and families based on their gender identity. It is also recommended that recipients use this [Notice](#) to notify applicants and participants of the Equal Access rule requirements.

Once an individual or family is admitted for assistance, Recipients must take nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by participants and, as needed, update admissions, occupancy, and operating policies and procedures in accordance with the CPD Equal Access Rule (81 FR 64782).

vii. Prioritized Subpopulations and Fair Housing Implications

Recipients shall comply with applicable civil rights laws, including the Fair Housing Act. Within this framework, these standards establish subpopulations to be prioritized for housing and services that align with the identified needs of the local community and the goals of the Federal Strategic Plan to End Homelessness. Subpopulations may be prioritized as long as doing so does not discriminate against any protected class under federal nondiscrimination laws in 24 CFR § 5.105; subpopulations may also be prioritized according to who needs the specialized supportive services that are offered by the project. 24 CFR § 578.93(b)(2) and (7).

1. *Dedicated versus Prioritized*

Projects and/or beds that are *dedicated* to serving a specific subpopulation must continue serving only this subpopulation. (For instance, a Permanent Supportive Housing project that is dedicated to serving chronically homeless individuals must continue serving only chronically homeless individuals). Projects and/or beds that are not currently dedicated to serving a specific subpopulation must give the designated subpopulations priority for admission, in the order established by these standards, when a bed becomes available through turnover. This means that if two otherwise eligible individuals are seeking admission into the program, one who falls within the designated prioritized subpopulation and one who does not, the individual who is in the designated prioritized subpopulation must be given priority for admission. **For both dedicated and prioritized beds, if there are no persons on a waiting list or applying for entrance to the program who fall within the dedicated or first priority subpopulation, recipients should not hold the unit vacant, but instead should serve the next prioritized subpopulation who may benefit from the services being provided.**

2. *Fair Housing Implications*

The Local Standards establish priority subpopulations by project type (i.e. Permanent Supportive Housing); recipients may not set more restrictive priorities unless a federal statute or executive order specifically authorizes this limitation, or unless expressly authorized by 24 CFR § 578.93(b)(1) to (7). For instance, while a Permanent Supportive Housing project may prioritize chronically homeless persons with a qualifying disability per the Local Standards, beds may not be reserved to persons with a *specific* disability (i.e. physical disability). If an individual who is otherwise qualified but who does not have a *physical* disability seeks admission and would benefit from the services offered, this person may not be excluded from the project. Alternatively, for example, recipients may reserve beds for persons with HIV/AIDS if the housing also receives funding from the Housing Opportunities for People with AIDS program (HOPWA).

IV. Policies & Procedures

To best meet the needs of the community and in accordance with 24 CFR § 576 and 24 CFR § 578, the following policies and procedures have been established to ensure consistent practices in regard to admission, service requirements, duration of assistance, and exiting for all homeless housing projects within the Everett/Snohomish County Continuum of Care. All projects must use the Snohomish County Coordinated Entry system, which follows the adopted Orders of Priority, Attachment A.

a. Emergency Shelter (ESG only)

The overarching goal of ESG projects is to reduce the time spent homeless. ESG Emergency Shelter funds are intended to respond to crisis and provide short-term emergency assistance to enable homeless households to move toward independent living by obtaining permanent housing as quickly as possible.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Snohomish County who have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Recipients that are defined as Victim Service Providers will exclusively serve individuals and families who are fleeing or attempting to flee domestic violence. *See Section IV, [Victim Service Providers](#), and [Table 6.2](#), Category 4, for additional details.* All participants served in Emergency Shelter must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

Each participant will be assessed to identify needs and barriers to obtain housing and increase self-sufficiency. An initial evaluation and assessment must be completed at program entry, including verifying and documenting eligibility. If a participant's stay in Emergency Shelter is longer than 30 days, then the recipient must reassess and document the need for continued services every 30 days while the participant continues in shelter. The reassessment must show that the participant needs additional time in shelter to obtain other housing, and would be unsheltered without ESG assistance.

Obtaining appropriate housing, particularly permanent housing, and addressing the most immediate and manageable barriers is the priority for emergency shelters. Given the expected short-period of assistance, the focus is on those barriers that can be addressed during the timeframe of assistance. Each participant will have a housing stability/service plan that may include longer-term solutions to other barriers or risk-factors that might destabilize a household after assistance has ended. *See Section XIV, [Recordkeeping Requirements](#).* This plan is to be completed at program entry and updated at least every 30 days for Emergency Shelter. The plan will be derived from the assessment and include at a minimum, housing stability goals and other goals as appropriate to the essential services identified in the Subrecipient's ESG Application and Statement of Work (Exhibit B) of the Contract. Each participant will participate in developing her/his own individualized housing stability/service plan to obtain housing and maintain housing stability after ESG-funded assistance ends.

Recipients may use their current evaluation and assessment form, reassessment form, tracking method, and housing stability/service plan, or develop new forms or other tracking methods. The evaluation, assessment, reassessment, housing stability/service plan, and goals must be documented according to the recipient's protocols for documentation, and at a minimum must be in a format that is readily available for monitoring. Essential services must be tied directly to the needs and barriers identified in the assessment and recipients are encouraged to build on the participants' strengths to attain housing stability and increase self-sufficiency.

iii. Lease Requirement

In ESG-Emergency Shelters, participants must *not* be required to sign a lease or occupancy agreement. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. Duration of Assistance

ESG-Emergency Shelters must operate a maximum 90-day project model. To the extent practicable, participants will be assisted in obtaining housing within 30 days of entry into the emergency shelter. All ESG-shelters will strive to reduce the average length of stay. However, participants may stay longer in order to prevent them from becoming homeless, on the streets, or other places not meant for human habitation.

The County works with the Continuum of Care community stakeholders to develop policies for the maximum allowable length of stay in emergency shelters as well as to identify benchmarks to enhance efficient utilization of the homeless services system. These policies and benchmarks will be updated during the applicable funding rounds. Updates will be communicated through revisions to these Local Standards and in Subrecipient contracts.

v. Exiting

To the degree practicable, participants exiting emergency shelter will be assisted in accessing housing that best fits their needs, with a preference for assisting participants to access permanent housing. Exits may also include participants entering treatment facilities to address mental health, substance abuse, or medical needs; recipients will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at exit, so that participants have knowledge of where to go when treatment is completed.

b. Transitional Housing (CoC only)

The policies and procedures in this Section b apply only to Transitional Housing funded under the CoC Program.

i. Admission

To the extent practicable, recipients will prioritize individuals and families who are currently living in Snohomish County; cannot be more appropriately served by another program or system of care; have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground; lack a support network and have no other options or resources for housing. Further, recipients shall prioritize participants who qualify for an emergency transfer consistent with the VAWA Written Standards, as described

in Appendix C. Transitional Housing is reserved for persons with high barriers who require longer-term interventions. All participants served in Transitional Housing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. Service Requirement

For Transitional Housing projects, supportive services must be made available to participants throughout the duration of their residence in the project. Services must be necessary to assist participants to obtain and maintain permanent housing. Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participant needs and services must be adjusted accordingly. See Section XIV, [Recordkeeping Requirements](#).

iii. Lease Requirement

Participants must sign a lease or occupancy agreement that is for a term of at least one (1) month but no more than twenty-four (24) months and cannot be extended. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. Duration of Assistance

Transitional Housing facilitates the movement of homeless households to permanent housing within 24 months of entry. Services may also be provided to former residents of Transitional Housing for no more than 6 months after leaving Transitional Housing to assist their adjustment to independent living.

Limitation on Transitional Housing

If permanent housing for a participant has not been located or if the participant requires additional time to prepare for independent living, Transitional Housing may be extended beyond the 24-month limit. However, if more than fifty percent (50%) of participants remain in the project beyond twenty-four (24) months, HUD may discontinue assistance for the project.

v. Exiting

The sole purpose of Transitional Housing is to assist participants to obtain permanent housing. Except in extenuating circumstances, participants will exit transitional housing to permanent housing within 24 months.

c. Homelessness Prevention (ESG Only)

Homelessness Prevention is intended to prevent households from moving into emergency shelter or other homeless situations.

i. Admission

Prevention assistance will be prioritized for individuals and families who are currently living in Snohomish County, cannot be more appropriately served by another program or system of care, lack a support network and have no other options or resources for housing. Prevention projects must collect documentation that participants would become homeless but for this assistance. All participants served under Prevention must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

ii. **Service Requirement**

Prevention projects must require the participant to develop a plan on how they will retain permanent housing after assistance ends and to meet with a case manager not less than once per month* to assist the participant in maintaining long-term housing stability as set forth in 24 CFR § 576.401 (e)(1)(i). *See Section XIV, [Recordkeeping Requirements](#).*

***Exception:** Recipients that also receive funding under the Violence Against Women Act of 1994 (VAWA) or the Family Violence Prevention and Services Act (FVSP) are exempt from the requirement to meet with participants monthly because these programs prohibit making housing conditional on the participant's acceptance of services. *See § 576.401(e)(2). See also [Victim Service Providers](#).*

Re-evaluation of eligibility is required for Prevention; re-evaluation must occur at least every three (3) months. Re-evaluations must be documented in each participant's file and demonstrate that the participant lacks sufficient resources and support networks necessary to retain housing without assistance. Re-evaluations must also demonstrate that the household's annual income is less than or equal to 30% of the Area Median Income (AMI). Projects must follow evaluation and participant eligibility rules and regulations as set forth in 24 CFR § 576.401(a) through (e).

All supportive services will be provided as necessary to help participants maintain permanent housing, or move as quickly as possible into permanent housing and achieve stability in that housing. Supportive services are limited with ESG funds and may be used only to provide housing relocation and stabilization services. Prevention assistance must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR § 576.104 and 576.105, the short- and medium-term rental assistance requirements in 24 CFR § 576.106, and the written standards and procedures established under 24 CFR § 576.400.

Rent Subsidy Models

Prevention funds are used to assist participants to remain in permanent housing and regain stability. Or, where the current housing does not meet the participant's needs, the participant may move to more suitable housing. Funds may be used to provide short-term (up to 3 months) or medium-term (4 to 24 months) rental assistance over a 3-year period. Funding requirements may be further limited or defined by the Everett/Snohomish County Continuum of Care in Notices of Funding Availability (NOFAs) or Requests for Proposals (RFPs) but at a minimum, all participants served in Prevention projects must have an identified rent subsidy model prior to receiving assistance or moving into a unit and this must be consistent throughout their term of service. The steps must be known (and documented) in advance and act as deadlines for increasing income. Whether the rent subsidy is based on participants' income or a fixed rate, the subsidy declines in "steps" until the participants assume full responsibility for monthly housing costs either by:

- Using a fixed timeline; or
- When the participant has reached specific goals

Rent assistance will be graduated, so the participants' share of rent will increase until they pay full rent. Should participants experience a situation that prevents them from achieving the graduated subsidy goal, then the subsidy may be extended or adjusted with a revised graduated subsidy established. Participants must be in compliance with the program and

working on their housing stability plan to be considered for an extension or revised graduated subsidy plan.

Participants may receive up to two (2) subsequent financial assistance payments after their graduated subsidy has ended if they were compliant with their housing stability plan and they experienced a hardship that prevented them from making their payment. Hardships may include a job loss or reduction in pay/hours, medical expenses, or other similar situation. The participant must not have exited the program to receive assistance. However, at no time may the rental assistance exceed 24 months in any three (3) year period.

iii. Lease Requirement

For ESG-Homelessness Prevention, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII, [Housing Requirements](#).

iv. Duration of Assistance

For participants seeking permanent housing, housing stability case management may not exceed 30 days. Once permanent housing is obtained, rental assistance may not exceed 24 months during any three (3) year period, although the assistance may be further limited or defined by the Everett/Snohomish County Continuum of Care. A graduated subsidy model must be identified and applied to all participants as outlined above in Section c.ii, [Service Requirement](#).

v. Exiting

Prior to the assistance ending, a plan must be in place that identifies how the participant will maintain stability in permanent housing. If the participant is not yet able to retain permanent housing, they will be re-assessed. Participants may receive additional assistance to prevent them from becoming homeless, on the streets, or other places not meant for human habitation. However, participants may not receive more than 24 months of rental assistance in any three (3) year period.

d. Rapid Rehousing

Rapid Rehousing is a type of permanent housing that offers supportive services, as needed, and/or short-term (up to three (3) months) or medium-term (three (3) to 24 months) rental assistance in order to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability. 24 CFR § 578.37(a)(1)(ii). Participants may locate housing of their choice in the private rental market within Snohomish County.

Rapid Rehousing projects must comply with the [Office of Community and Homeless Services \(OCHS\) Rapid Rehousing Guide](#), which is incorporated herein by reference.

i. Admission

Recipients of Rapid Rehousing projects must accept new participants only through the Snohomish County Coordinated Entry System. Rapid Rehousing projects must collect documentation that participants would become homeless but for this assistance. Rapid Rehousing assistance will be prioritized for individuals and families according to the adopted Orders of Priority, Attachment A, which include policies for prioritizing participants who

qualify for an emergency transfer consistent with the VAWA Written Standards, as described in Appendix C. All participants served under Rapid Rehousing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#), and as further described in the [OCHS Rapid Rehousing Guide](#).

ii. Service Requirement

Refer to the [OCHS Rapid Rehousing Guide](#).

iii. Lease Requirement

Refer to the [OCHS Rapid Rehousing Guide](#). For CoC-Rapid Rehousing, participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For ESG-Rapid Rehousing, participants must sign a legally binding, written lease agreement; however, there are no requirements regarding a minimum term or other standards. For additional information, refer to Section XIII [Housing Requirements](#).

iv. Duration of Assistance

Refer to the [OCHS Rapid Rehousing Guide](#).

v. Exiting

Refer to the [OCHS Rapid Rehousing Guide](#).

e. Permanent Supportive Housing (CoC only)

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. The policies and procedures in this Section e apply to all Permanent Supportive Housing within the Everett/Snohomish County Continuum of Care.

i. Admission

Recipients of Permanent Supportive Housing projects must accept new participants only through the Snohomish County Coordinated Entry System. Permanent Supportive Housing projects will be prioritized for individuals and families with the longest histories of homelessness and the most severe service needs, according to the adopted Orders of Priority, Attachment A, which include policies for prioritizing participants who qualify for an emergency transfer consistent with the VAWA Written Standards, as described in Appendix C. See also [HUD CPD-16-11, Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing](#). All participants served in Permanent Supportive Housing must meet the appropriate eligibility requirements as described in Section VI, [Participant Eligibility](#).

Severe Service Needs

The most severe service needs, which should be identified and verified through data-driven methods (e.g., an administrative data match or through the use of a standardized assessment tool and process), means that at least one (1) of the following is true:

- History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or

- Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.

ii. Service Requirement

Permanent Supportive Housing projects must offer supportive services for the participants that enable them to live as independently as is practicable throughout the duration of their residence in the project. Each participant must have an individual support plan in place, derived from recipients' ongoing, at least annual, assessment of participants' needs and services must be adjusted accordingly. *See Section XIV, [Recordkeeping Requirements](#).* Services must be necessary to assist participants obtain and maintain housing.

iii. Lease Requirement

Participants must sign a lease that is for an initial term of one (1) year, that is terminable only for cause, and that automatically renews upon expiration (goes month-to-month). For additional information, refer to Section XIII [Housing Requirements](#).

iv. Duration of Assistance

There is no designated length of stay for participants of this type of housing.

Participants receiving rental assistance are permitted to be out of their unit for the purpose of brief institutional stays (jail, hospital, treatment) for a period not to exceed 90 days per occurrence.

v. Exiting

Permanent Supportive Housing is intended to be available to participants for as long as it provides housing assistance that meets their needs. Successful exits from Permanent Supportive Housing include exiting to other permanent housing destinations.

f. All Project Types

Safeguards, Safety and Needs of Special Populations

i. Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

The 2013 reauthorization of the Violence Against Women Act (VAWA) and HUD's final rule (81 FR 80798), which implements the requirements of VAWA, provide protections to victims of domestic violence, dating violence, sexual assault, and stalking under programs funded by HUD, including the CoC Program, ESG Program, and HOME Investment Partnerships (HOME) Program. Recipients are required to comply with the VAWA final rule and the locally adopted VAWA Written Standards, including Emergency Transfer Plan. The VAWA Written Standards, including the Emergency Transfer Plan, are located in Appendix C.

ii. Victim Service Providers

The term 'victim service provider' means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. Such organizations include rape crisis centers, battered women's shelters,

domestic violence transitional housing programs, and other programs (Section 401(32) McKinney-Vento Act).

Projects serving individuals or families who qualify under Category 4 of the Defining “Homeless” Rule (persons fleeing or attempting to flee domestic violence) must follow all related federal and state laws, follow confidentiality policies, and have written policies and procedures regarding the provision of specific services to meet the safety and special needs of this population.

iii. Veterans

Projects serving veterans experiencing homelessness must prioritize those veterans who are ineligible for Veterans Affairs (VA) services, and work closely with the local Department of Veterans Affairs and coordinate resources with VA-funded housing and services (e.g. HUD-Veterans Affairs Supportive Housing (HUD-VASH), Supportive Services for Veteran Families (SSVF), etc.). Veterans must be screened for eligibility for VA-funded housing and/or services.

iv. Youth

HUD’s definition of youth includes unaccompanied children under age 18 or youth between the ages of 18 and 24. Projects serving youth must prioritize youth based upon vulnerability to victimization, length of time homeless, unsheltered homeless, lack of access to family and community support networks, and current or past sexual exploitation.

It is important to note that youth are not responsible for obtaining their own eligibility documentation; instead, intake workers are responsible for documenting the youth’s eligibility (including homelessness status). Further, intake workers must consider the youth’s safety concerns before contacting third parties: intake workers must *not* contact anyone that the youth does not want contacted because of fears for his/her safety.

v. High Needs

Projects serving individuals and families with very high needs must provide shelter/housing and services that meet the special needs for these populations.

vi. Mobility for Participants Receiving Tenant-Based Rental Assistance

Participants who are receiving Tenant-Based Rental Assistance and have complied with all program requirements during their residence may retain the rental assistance and move to a different Continuum of Care geographic area in two (2) circumstances:

1. The recipient is able to meet *all program* requirements, either directly or through a third-party contract or agreement, in the geographic area where the participant chooses housing, 24 CFR § 578.51(c)(2) and (4);

or

2. If the participant has been a victim of domestic violence, dating violence, sexual assault, or stalking, and:
 - a. The participant:
 - Reasonably believes they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking if they remained in the unit;

- Is able to document the violence and basis for their belief;
- Moves to protect their health and safety; and
- b. The recipient is able to meet *statutory* requirements, either directly or through a third-party contract or agreement, in the geographic area where the participant chooses housing, including:
 - HQS inspections;
 - Addressing the supportive service needs of participants; and
 - Ensuring that children are enrolled in school and connected to appropriate services in the community.

If each item in paragraph 2 is met, the recipient may continue to serve the participant in the new geographic area even if the recipient cannot meet all *regulatory* requirements, 24 CFR § 578.51(c)(3).

vii. Education Services

The educational needs of children and youth must be accounted for, to the maximum extent practicable, and families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services, as appropriate. 42 U.S.C. 11432 et. seq. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services as well as other State and local education services. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and participants understand their rights.

Collaboration with McKinney-Vento Local Education Liaisons

Recipients must document whether school-aged children are eligible for McKinney-Vento services and whether the child is connected with a local education liaison. If the child is not already engaged, recipients must refer the family directly to the liaison at their school of choice. All applicants/participants with school-aged children must be provided with documentation that explains their rights under the McKinney-Vento Act and that provides contact information for the liaison at every school district within Snohomish County.

Collaboration with State Educational Coordinators

Recipients must also document that they have discussed the Washington State Early Childhood Education and Assistance Program (ECEAP), a free preschool program, with income-eligible families who have children between the ages of four (4) to five (5) years old.

viii. Low-Barrier and Housing First

Recipients that indicated in the applicable CoC Project Application that the project would follow a Low-Barrier and Housing First approach must operate the project accordingly. All other projects are strongly encouraged to use a Low-Barrier and Housing First approach to facilitate homeless individuals' and families' rapid return to housing.

A housing first approach allows eligible homeless individuals and families to enter the project without barriers, such as income or sobriety requirements, or service participation

requirements. Application and admission policies should be as streamlined and short as possible to move eligible individuals and families into permanent housing as quickly as possible. Projects using a housing first approach offer supportive services; however, participation in these services is based on the needs and desires of the program participant.

To be considered Housing First, the project must follow a Low-Barrier approach (as described below) *and* must *not* terminate participants from the program for the following reasons:

1. Failure to participate in supportive services
2. Failure to make progress on a service plan
3. Loss of income or failure to improve income
4. Being a victim of domestic violence
5. Any other activity not covered in a lease agreement typically found in the project's geographic area

To be considered Low-Barrier, participants must *not* be screened out based on the following:

1. Having too little or no income
2. Active or history of substance abuse
3. Having a criminal record with exceptions for state-mandated restrictions
4. History of domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement)

Persons may be terminated from the program *only* when violations of the lease are serious, and only in the most severe cases. Use of alcohol or drugs in of itself (without other lease violations) is not a reason for program termination. It is important to note that a participant may be evicted from the housing unit, but this does not mean that the recipient must terminate the participant from the program; the recipient may continue serving the participant in another housing unit.

V. Components and Eligible Activities

This section will help to determine and define the allowable activities within a project as defined by the project component under both ESG and CoC. Components define a type of project (e.g., Transitional Housing) and have a set of allowable activities (e.g., Supportive Services). Activities are a set of allowable costs. For example, a phone line for a case manager might be considered a Supportive Services activity under the Transitional Housing component for the CoC Program.

ESG and CoC Programs each have five (5) eligible components that are detailed in [Table 5.1](#) (ESG) and [Table 5.7](#) (CoC). Rapid Rehousing, Homeless Prevention and HMIS are allowable components of both funding sources; however, the activities that are allowable vary by Program. Street Outreach and Emergency Shelter are eligible under ESG only. Permanent Supportive Housing, Transitional Housing and Supportive Services Only are unique to the CoC Program. It is important to become familiar with the allowable activities under the funded component. The areas in grey are currently not being funded.

The funded components of a project are described in the contract with HUD for direct recipients or with Snohomish County for Subrecipients.

a. Emergency Solutions Grant

i. Eligible ESG Components

Table 5.1	ESG Eligible Components			
Street Outreach	Emergency Shelter	Homelessness Prevention	Rapid Rehousing	HMIS

ii. Eligible ESG Activities

1. *Street Outreach 24 CFR § 576.101 (ESG Only)*

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people, referred to as Street Outreach. However, there are no Street Outreach projects being funded with ESG at this time. Policies will be developed at the time that the Everett/Snohomish County Continuum of Care chooses to fund projects under this component.

Table 5.2		ESG Street Outreach - Eligible Activities			
Essential Services					
Engagement	Case Management	Emergency Health Services	Transportation	Emergency Mental Health Services	Services for Special Populations

2. [Emergency Shelter](#) 24 CFR § 576.102 (ESG Only)

Definition

Emergency Shelter is defined as any facility, where the primary purpose is to provide “a temporary shelter for the homeless in general, or for specific populations of the homeless people and which does not require occupants to sign leases or occupancy agreements.

Any project that was funded under a Fiscal Year 2010 Emergency Solutions Grant may continue to be funded under ESG (24 CFR § 576.2).” However, because of the limited number of funding sources for which emergency shelter costs are eligible, Emergency Shelter will be prioritized for funding under ESG.

Table 5.3	ESG Emergency Shelter – Eligible Activities		
Essential Services			
Case Management	Child Care	Education Services	Employment Assistance & Job Search
Outpatient Health Services	Legal Services	Life Skills Training	
Mental Health Services	Substance Abuse Treatment Services	Transportation	Services for Special Populations
Renovation			
Shelter Operations			
Assistance Required Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970			

3. [Homelessness Prevention](#) 24 CFR § 576.103 (ESG Only)

Definition

Homelessness Prevention provides housing relocation, stabilization services and short- and medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in Category 1 of the Defining “Homeless” Rule, see [Table 6.2](#). Snohomish County is not currently pursuing projects for which this definition would apply. Policies will be developed at the time that the Everett/Snohomish County Continuum of Care chooses to fund projects under this component.

<i>Table 5.4</i>	<i>ESG Homelessness Prevention – Eligible Activities</i>
<i>Housing Relocation & Stabilization Services</i>	
<i>Short- and/or Medium-Term Rental Assistance</i>	

4. [Rapid Rehousing](#) 24 CFR § 576.104 ([ESG](#))

Definition

Rapid Rehousing provides housing relocation, stabilization services and short- and medium-term rental assistance to help homeless individuals or families move as quickly as possible into permanent housing and achieve stability in that housing.

Please note: Rapid Rehousing varies between ESG and CoC Program Regulations. Refer to the [OCHS Rapid Rehousing Guide](#).

<i>Table 5.5</i>	<i>ESG Rapid Re-Housing – Eligible Activities</i>
<i>Housing Relocation & Stabilization Services</i>	
<i>Short- and/or Medium-Term Rental Assistance</i>	

5. *HMIS Component 24 CFR § 576.107 (ESG)*

Section 416(f) of the McKinney-Vento Act requires for the first time that ESG-funded projects participate in the Homeless Management Information System (HMIS). The ESG interim rule makes certain costs eligible to the extent necessary to enable this participation. HUD published a proposed rule on HMIS, 24 CFR part 580, that will govern HMIS when it is published as final.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.b for CoC information on the [HMIS component](#) and [HMIS eligible activities](#).

County policy is to share HMIS funds with Subrecipients. The amount available will be determined at the time of award and through the contracting process and shall be based upon funding available. If a Subrecipient receives funding allocated for HMIS costs, they must track the time spent entering HMIS data separately on a timesheet and provide back-up documentation when requested. A different line item will be provided on Subrecipient Invoices with the expectation of the HMIS time being reported separately.

6. *Administrative Costs (ESG)*

<i>Table 5.6</i>	<i>ESG Administrative Costs</i>
Snohomish County Human Services Department retains all administrative funds to manage contracts, complete monitoring and cost reimbursement activities.	

b. Continuum of Care

i. Eligible CoC Components

Table 5.7		CoC Eligible Components			
Permanent Housing (PH)		Transitional Housing (TH)	Supportive Services Only (SSO)	HMIS	Prevention (HPC* Only)
Including:					
PSH**	RRH***				
*High Performing Community (as designated by HUD) **Permanent Supportive Housing ***Rapid Rehousing					

1. *Permanent Housing 24 CFR § 578.37(a)(1)(CoC)*

Definition

Permanent Housing is community-based housing, the purpose of which is to provide housing without a designated length of stay. Under the CoC Program, Permanent Housing includes both Permanent Supportive Housing and Rapid Rehousing.

a. [Permanent Supportive Housing](#) 24 CFR § 578.37(a)(1)(i)(CoC)

Definition

Permanent Supportive Housing provides assistance to individuals with disabilities and families in which one adult or child has a disability. Supportive Services designed to meet the needs of the participant must be made available to the participant.

b. [Rapid Rehousing](#) 24 CFR § 578.37(a)(1)(ii)(CoC)

Definition

CoC funds under Rapid Rehousing may be used to provide supportive services and/or short-term (up to 3 months), and/or medium-term (3 to 24 months) tenant-based rental assistance.

Please note: Rapid Rehousing varies between ESG and CoC Program Regulations. Refer to the [OCHS Rapid Rehousing Guide](#).

2. [Transitional Housing](#) 24 CFR § 578.37(a)(2)(CoC)

Definition

Transitional Housing is housing that facilitates the movement of homeless individuals and families to permanent housing within 24 months.

3. [Supportive Services Only](#) 24 CFR § 578.37(a)(3) (CoC)

Definition

Projects that contain a Supportive Services Only (SSO) component provide supportive services to unsheltered and sheltered homeless persons for whom the recipient is not providing housing or housing assistance. The lack of housing or housing assistance provision is the defining difference between a project that is considered to be an SSO project, versus a project that is considered to be a housing project even if the only activities funded under the CoC are services. The County is not currently funding projects for which this definition would apply.

4. [HMIS](#) 24 CFR § 578.37(a)(4)(CoC)

Under the CoC Program, only the Homeless Management Information System (HMIS) Lead, in this case Snohomish County, may apply for a project with an HMIS component; however, HMIS may be an eligible cost for a recipient if permitted by the contract.

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities](#) and Section V.b for CoC information on [HMIS eligible activities](#).

5. [Prevention](#) 24 CFR § 578.37(a)(5)(CoC)

Homelessness Prevention is an eligible component under the CoC Program only for Continuums of Care that are designated as a High Performing Community (HPC) as defined by Subpart E of 24 CFR § 578. Snohomish County is not currently designated as an HPC.

ii. **Eligible CoC Activities**

The CoC Program allows for a number of different eligible activities. Each project's ability to expend funds for the costs listed below is limited by the project's component, project application, Subrecipient Contract with the County and the NOFA.

Please note that the following is a list of all eligible activities under the CoC Interim Rule. Costs such as *CoC Planning Activities* and *UFA Costs* are eligible only if the County is funded for such activities, and then only the County, as the Collaborative Applicant, can bill to them. Acquisition, Rehabilitation, New Construction and Relocation are onetime costs and the County is not currently pursuing such activities due to limited funding. In the table below, activities have been shaded in grey to indicate that they are not billable.

Table 5.8		CoC Eligible Activities	
CoC Planning Activities		UFA* Costs	Acquisition
Rehabilitation		New Construction	Leasing
Rental Assistance		Supportive Services	Operating Costs
HMIS	Project Administration	Relocation Costs	Indirect Costs
*Unified Funding Agency			

As mentioned above, the CoC Program authorizes a variety of eligible activities; however, projects may charge costs to the grant only that are agreed upon in the contract between the Subrecipient and Snohomish County or between the direct recipient and HUD. Therefore, activities that are not being utilized locally have not been included below.

Table 5.9		CoC Eligible Activities* by Component		
		PH: PSH	PH: RRH	TH
Housing Costs**	Leasing	X		X
	Rental Assistance	X	X	X
	Operating	X		X
Supportive Services		X	X	X
HMIS		X	X	X
Administration		X	X	X
Indirect Costs		X	X	X
* Refer to Eligible CoC Activities below.				
**The following Housing Costs may not be combined in the same project:				
- Rental Assistance and Leasing				
- Rental Assistance and Operating				

1. **Leasing 24 CFR § 578.49 (CoC)**

Leasing funds under the CoC Program may be used to lease a structure or individual units to provide housing or supportive services to homeless persons. Funds cannot be used to lease units or structures owned by the recipient, Subrecipient, their parent organization(s), or other organizations more fully described in 24 CFR § 578.49(a) unless authorized by HUD.

Where utilities are included in the rent amount, utilities (electricity, gas, water) are considered a leasing cost. Where the utilities are separate from the rent, they are considered an operating cost. Utilities for supportive service structures are considered a supportive services cost regardless of utilities being included or excluded from the rent amount.

Leasing funds may be used to pay a security deposit but it must not exceed two months of actual rent. It is permissible to pay first and last month's rent.

Table 5.10		CoC Leasing – Eligible Costs*	
Length of Housing Assistance			
Transitional Housing Up to 24 months		Permanent Supportive Housing Unlimited	
Model of Assistance			
Structure(s)	Portion of Building(s)	Individual Units	
Other Eligible Costs			
Vacancy Payment – Recipients must abide by the terms of the master lease and pay rent for the unit regardless of whether the unit is occupied. However, the recipient must make every effort to house an eligible participant in the vacant unit as quickly as possible.			
Utilities (electricity, gas, water) – only if included in the rent		Security Deposits – not to exceed 2 months of rent	
* Damages are not an eligible Leasing cost.			

<i>Table 5.11</i>		<i>CoC Leasing – Key Requirements</i>	
Unit Rent Standard	Rent paid by the recipient for a unit must be reasonable in comparison to similar units, cannot exceed comparable unassisted units and cannot exceed Fair Market Rent. See Section XIII.d, Rent Reasonableness and Fair Market Rent .		
Unit Lease – Master Lease and Sublease	Agencies must have a “master” lease agreement with the landlord/owner. Leasing costs are paid directly to the landlord/owner in accordance with the master lease. Recipients must have a sublease in place with participants. See Section XIII.e, Housing Agreements .		
Participant Rent	Agencies are not required to have participants pay rent, but if they choose to charge participants rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the participant’s adjusted monthly income, 10% of the participant’s monthly income, or the welfare rent. For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) . Any participant rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97.		

2. *Rental Assistance 24 CFR § 578.51 (CoC)*

Rental assistance funds may be used to provide homeless individuals or families with short-, medium- or long-term rental assistance as outlined below. Rental assistance cannot be provided to participants who are already receiving rental assistance, or living

in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources.

Administering Rental Assistance

Contracting for and making rental assistance payments to landlords, as well as conducting [Housing Quality](#) Standards (HQS) Inspections are considered to be a service delivery cost of rental assistance and is therefore an eligible cost under this section. Other eligible costs of administering rental assistance include: examining participant income and family composition; providing housing information and assistance; and receiving new participants into the program.

Table 5.12		CoC Rental Assistance – Eligible Costs	
Length of Housing Assistance			
Short-Term Up to 3 months	Medium-Term From 3 to 24 months	Long-Term >24 months	
Model of Assistance			
Tenant Based Participants choose unit	Sponsor Based Participants reside in housing owned or leased by Sponsor	Project Based Units are provided through a contract with the owner	
Other Eligible Costs			
Vacancy Payment – up to 30 days following end of the month when unit vacated	Property Damage – may not exceed one month’s rent; one-time cost per participant at the time participant exits unit	Security Deposits – not to exceed 2 months of rent	
Administering Rental Assistance – Eligible Costs			
Processing rental payments to landlords	Examining participant income and family composition	Providing housing information and assistance	
Inspecting units for compliance with Housing Quality Standards (HQS)		Receiving new participants into the program	

<i>Table 5.13</i>	<i>CoC Rental Assistance – Key Requirements</i>
Unit Rent Standard	The unit rent must be reasonable in comparison to similar units and cannot exceed comparable unassisted units. <i>See Section XIII.d, Rent Reasonableness and Fair Market Rent.</i>
Unit Lease – Lease and Rental Assistance Agreement	Participants must have a lease agreement with the landlord/owner of housing. In addition, recipients may make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the participant (including notices to vacate, notices of noncompliance, etc.). <i>See Section XIII.e, Housing Agreements.</i>
Participant Rent	Except in Rapid Rehousing projects, participants must contribute toward their rent in accordance with 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)). Changes to rental payment amounts must be made as changes in income are identified (no less than annually). For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) .

3. *Supportive Services 24 CFR § 578.53 (CoC)*

Supportive Services funds may be used to provide supportive services that address the special needs of participants. Services must be limited to those which assist participants in obtaining and maintaining housing. Ongoing, at least annual, assessments of service needs are required and services should be adjusted accordingly. Where supportive services are provided within a facility not contained in a housing structure, the costs of operation of the facility are eligible, including maintenance, repair, building security, utilities and equipment.

The following table is a complete list of eligible costs under this component. *See 24 CFR § 578.53(e) for additional details about what these costs include.*

<i>Table 5.14</i>	<i>CoC Supportive Services – Eligible Costs</i>	
Annual Assessment of Service Needs	Assistance with Moving Costs	Case Management
	Food	Housing Search & Counseling Services
Employment Assistance & Job Training	Outpatient Services	Outreach Services
	Education Services	Legal Services
Mental Health Services	Substance Abuse Treatment Services	Transportation
Child Care		
Life Skills Training	Utility Deposits	Direct Provision of Services

4. *Operating Costs 24 CFR § 578.55 (CoC)*

Operating funds may be used to pay the day-to-day costs of operation of transitional and permanent housing in a single structure or individual units. Operating costs for

supportive service facilities are considered supportive services; *see Section V.b, [Supportive Services](#).*

Table 5.15	CoC Operating – Eligible Costs		
Model of Assistance			
Structure		Individual Units	
Eligible Costs			
Repair & Maintenance	Property Tax & Insurance	Scheduled payments to reserve	Security*
Electricity, Gas & Water	Furniture		Equipment
*Where >50% of the units are paid for with grant funds			

<i>Table 5.16</i>		CoC Operating – Key Requirements
Unit Rent Standard	Not applicable.	
Unit Lease	Participants must have a lease or occupancy agreement with the recipient. <i>See Section XIII.e, Housing Agreements.</i>	
Participant Rent	Agencies are not required to have participants pay rent, but if they choose to charge participants rent, the rent must be calculated in accordance with 24 CFR § 578.77, and cannot exceed the highest of 30% of the participant’s adjusted monthly income, 10% of the participant’s monthly income, or the welfare rent. For further guidance on calculating rent, refer to Section X.g, Calculating Rent (or Occupancy Charge) . Any participant rent that is collected is considered Program Income and must be used for eligible costs in accordance with 24 CFR § 578.97.	

5. *HMIS 24 CFR § 578.57 (CoC)*

HMIS funds may be used to pay the costs of contributing data to the Snohomish County Homeless Management Information System (HMIS).

Please note: the HMIS Component varies between the ESG and CoC Program Regulations. See Section V.a for ESG information on [HMIS eligible activities](#) and Section V.b for CoC information on the [HMIS component](#).

<i>Table 5.17</i>		CoC HMIS – Eligible Costs	
Purchasing/Leasing Computer Hardware	Purchasing Software or Software Licenses	Purchasing/Leasing Equipment (telephones, fax machines, furniture)	Obtaining Technical Support
Leasing Office Space	Electricity, Gas, Water, Phone Service, High Speed Data Transmission	Salaries for Operating HMIS	Costs of Staff to Travel and Attend HUD Sponsored/ Approved Training on HMIS
Staff travel Costs to Conduct Intake		Participation Fees Charged by the Lead	

6. *Project Administration 24 CFR § 578.59 (CoC)*

CoC-funded projects may apply to use up to 10% of their project funds to pay for administrative costs. The NOFA may further limit project requests for administrative costs. For instance, during the FY2013 NOFA, local projects were limited to requesting no more than 7% in order to receive maximum points in this section of the application.

For projects through Snohomish County, administrative funds are split between the County (50%) and the Subrecipient (50%) for all projects unless determined otherwise by the County and Subrecipient.

Staff and overhead costs directly related to carrying out eligible costs are considered eligible under those activities and are not considered project administration.

Table 5.18	CoC Administrative Costs		
General Management & Oversight			
Preparing Budgets & Schedules		Assure Compliance	Development of Agreements to Carry Out Program Activities
Monitoring for Progress & Compliance		Preparing HUD Reports	Coordinating Resolution of Findings
Evaluating Results & Objectives		Managing/Supervising Staff Who Engage in General Management & Oversight	
Training on CoC Requirements		Environmental Reviews	

7. *Indirect Costs 24 CFR §578.63*

Indirect costs are eligible under the CoC Program and must be in accordance with OMB Uniform Guidance.

VI. Participant Eligibility

Eligibility for assistance under CoC and ESG Programs is determined by HUD Regulations 24 CFR § 578, and 24 CFR § 576 respectively. Eligibility is further defined by project component. The table below provides an overview of eligibility by component and funding type. Eligibility may be further restricted by the contract.

a. Eligibility By Component

<i>Table 6.1</i>		<i>Eligibility By Component</i>					
Component	Funding	Homeless Status Category*			Income**	Disability	Chronic Homeless (CH)
		1	2	4			
Shelter	ESG	X	X	X	N/A		
Prevention	ESG		X	X	X		
RRH	ESG / CoC	X			Required at Revaluation Only		
Transitional	CoC	X	X	X	N/A		
PSH	CoC	X			N/A	X	Prioritized
- PSH – CH Dedicated	CoC	X***			N/A	X	X
- PSH – DedicatedPLUS	CoC	X****			N/A	X	Prioritized
<p>X = Required N/A = Not Applicable *Homeless Status Categories are established by the Defining “Homeless” Rule; see Table 5.2 for corresponding categories **Participant’s annual income may not exceed the specified % of median family income for the area (AMI), as determined by HUD ***Permanent Supportive Housing that is dedicated to chronically homeless households must serve only persons who qualify as chronically homeless who are coming from a place not meant for human habitation, safe haven, or emergency shelter. While persons in transitional housing are considered to be Category 1 homeless, they do not qualify as chronically homeless. ****PSH – DedicatedPLUS is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied youth that at intake are:</p> <ol style="list-style-type: none"> (1) Experiencing chronic homelessness as defined in 24 CFR 578.3; (2) Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project; (3) Residing in a place not meant for human habitation, emergency shelter, or safe haven but were unable to maintain a housing placement and met the definition of chronic homeless as defined by 24 CFR 578.3 prior to entering the project; (4) Residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project. 							

b. Homeless Eligibility Criteria

In order to receive assistance, persons must meet the HUD definition of homeless as detailed below in [Table 6.2](#) for the duration of their participation in ESG projects, and at entry for CoC projects.

<i>Table 6.2</i>		Homeless Eligibility Criteria	
Cat.	Description	Component	Criteria
1	Literally Homeless	<i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Rapid Rehousing</i> <i>Permanent Supportive Housing</i>	A household is literally homeless if they lack fixed, regular & adequate nighttime residence, meaning: <ul style="list-style-type: none"> Sleeping in a place not designed for, or not ordinarily used as, a regular sleeping accommodation, including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Living in a shelter designated to provide temporary living arrangements, including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations, or federal/state/local government programs. Exiting an institution such as a jail or hospital where they resided for 90 days or less AND was residing in an emergency shelter or place not meant for human habitation immediately before entering the institution.
2	Imminent Risk of Homelessness	<i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Prevention</i>	A household that will imminently lose their primary nighttime residence provided that: <ul style="list-style-type: none"> The residence will be lost within 14 days of the application for assistance No subsequent residence has been identified; AND The individual or family lacks the resources or support networks needed to obtain other permanent housing
3	Unaccompanied Youth	<i>Not Applicable</i>	<i>Snohomish County is not currently pursuing projects for which this definition would apply</i>
4	Fleeing or Attempting to Flee Domestic Violence	<i>Emergency Shelter</i> <i>Transitional Housing</i> <i>Prevention</i>	Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life threatening conditions related to violence, who: <ul style="list-style-type: none"> Have no identified subsequent residence; AND Lack the resources and support networks needed to obtain other permanent housing.

c. Income 24 CFR § 576.103

Income limits are based on Area Median Income (AMI) and are updated at least annually by HUD. Projects that have an income eligibility requirement must ensure they are using the most current information available. Current income limits can be found at <http://www.huduser.org/portal/datasets/il.html>

d. Disability

In order to qualify for [Permanent Supportive Housing](#), the homeless household must have an adult or child member with a disability that meets the definition below (Docket No. FR-5333-F-02).

<i>Table 6.3</i>	<i>Disability</i>
Physical, Mental or Emotional Impairment	
A person shall be considered to have a disability if he or she has a disability that:	
(i)	is expected to be long-continuing or of indefinite duration;
(ii)	Substantially impedes the individual's ability to live independently;
(iii)	Could be improved by the provision of more suitable housing conditions; and
(iv)	Is a physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.
Developmental Disability	
A person will also be considered to have a disability if he or she has a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)	
HIV/AIDS	
A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).	
Other Considerations	
Notwithstanding the preceding provisions of this definition, the term <i>person with disabilities</i> includes, except in the case of the Single Room Occupancy (SRO) component, two or more persons with disabilities living together, one or more such persons living with another person who is determined to be important to their care or well-being, and the surviving member or members of any household described in the first sentence of this definition who were living, in a unit assisted under this part, with the deceased member of the household at the time of his or her death. (In any event, with respect to the surviving member or members of a household, the right to rental assistance under this part will terminate at the end of the grant period under which the deceased member was a participant.)	

e. Chronic Homelessness

Some projects under the CoC Program are specifically dedicated to or prioritized for persons with a disability who have had several episodes of homelessness or an extended duration of homeless, which is referred to as *Chronic Homelessness*.

i. Definition of Chronic Homelessness 24 CFR § 578.3

A homeless individual with a [disability](#) who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter and who has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least twelve (12) months or on at least four (4) separate occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in

homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter.

A person who meets the chronic homeless definition as described above, but who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days, and who was on the streets or in emergency shelter immediately before entering the institution, also qualifies as chronically homeless.

Chronically homeless persons also includes a family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria of chronic homelessness, including a family whose composition has fluctuated while the head of household has been homeless.

Table 6.4		Duration of Homelessness
Duration	Definition	
Continuous, for at least twelve (12) months		
On the streets or in emergency shelter continuously, without a break, for at least twelve (12) months		
Continuous	A stay on the streets or in emergency shelter without a break.	
Break	At least seven (7) or more consecutive nights not residing on the streets or in emergency shelter. Stays in institutional care facilities for fewer than 90 days do not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility.	
Twelve (12) Continuous Months	Twelve (12) consecutive calendar months. NOTE: If the person has a documented encounter with a homeless service provider on a single day within a given month, this is sufficient to consider the person homeless for the entire calendar month, unless there is evidence of a break in homelessness. This applies ONLY if the encounter is documented by third-party documentation – a self-declaration is insufficient.	
At least four (4) separate occasions in the last three (3) years where the combined occasions equal at least twelve (12) months		
On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years, as long as the combined occasions equal at least twelve (12) months and each break in homelessness separating the occasions included at least seven (7) consecutive nights of not living in a place not meant for human habitation, a safe haven, or in an emergency shelter		
Occasion	Separate and Distinct	Stay on the streets or in emergency shelter is interrupted by a Break (period of seven (7) or more consecutive nights residing in a place other than on the streets or in emergency shelter).
	Sustained	Stay on the streets or in emergency shelter is more at least one (1) night.
Three (3) years	Thirty-six (36) consecutive calendar months	
Twelve (12) Total Months	Four (4) separate occasions on the streets or emergency shelter that equal a cumulative total of twelve (12) months, meaning twelve (12) calendar months.	

ii. **Chronically Homeless Veterans**

The Department of Veteran's Affairs (VA) conducts an initial verification of status and subsequently provides services to qualified veterans through a single episode of care. This VA

“episode of care” may consist of services provided by different VA providers and/or different VA programs. Veterans who have been identified as chronically homeless through the VA’s initial intake maintain this status throughout his/her episode of VA care. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person documented as chronically homeless by the VA, no matter the services received during his/her episode of VA care (i.e., a project may serve a person identified as chronically homeless by the VA, even if (s)he was in VA-transitional housing).

iii. Chronic Homelessness and Rapid Rehousing

Persons identified as chronically homeless prior to enrolling in a rapid rehousing project *maintain* their status as chronically homeless while they receive rapid rehousing assistance. However, chronic homelessness must be documented (as described in Section VII, [Documentation Standards](#)) prior to entering the rapid rehousing program. Therefore, projects that are dedicated to or prioritized for chronically homeless persons may serve a person who is receiving rapid rehousing assistance as long as his/her chronic homeless status was documented prior to entering the rapid rehousing project.

f. Special Considerations for Serving a Person Who May be Undocumented

Eligibility for the receipt of public benefits is restricted by The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 which provides that people who are undocumented are not to receive public benefits. The Act further specifies how to inquire into a person’s status. However, programs that are necessary for the protection of life or safety, which provide short-term shelter or housing assistance, non-cash services at the community level, which is not means-tested are exempt.

This exemption does not apply to permanent housing programs however. HUD clarifies this matter through the SHP Desk Guide as such, “[...] nonprofit organizations are not required to, but may, verify an applicant’s citizenship or immigration status before providing assistance. If a nonprofit elects to verify citizenship or immigration status, they must follow the procedures required by the Act and should consult with their legal counsel on how to comply.”

g. Special Considerations for Households if Individual Members are Residing in Different Places

Persons presenting together as a household may be served together, regardless of marital status, actual or perceived sexual orientation, or gender identity. Refer also to Section III.b.iv, [Discrimination Based on Household Composition](#).

The implications of this are that household members may be residing in different places at entry. In order to determine the household’s eligibility for assistance, the recipient must determine eligibility based on the status of:

1. The adult head of household; or
2. The minor head of household when no adult is present.

If there is more than one (1) adult in the household, the household may choose which adult is considered to be the head of household for the purposes of determining eligibility.

Please note that the person, whose eligibility qualifies the entire household, must meet all of the applicable eligibility requirements for the project.

Refer also to HUD's Frequently Asked Question,
<https://www.hudexchange.info/faqs/2318/how-should-recipients-determine-a-family-s-eligibility-for-assistance/>.

VII. Documentation Standards for Eligibility for Assistance

a. Eligibility Overview

Participants must be deemed eligible as described in Section VI, [Participant Eligibility](#). The tables below describe the required documentation for each funding source and project component and details the type of documentation required to meet federal requirements and local standards. Required documentation must be clearly noted and documented in the participant's case file. The County has developed standard forms that may be used by recipients to document eligibility; these forms are located on the County's Continuum of Care Program webpage: <https://snohomishcountywa.gov/2748/CoC-Program>.

b. Homeless Verification

Intake staff are required to document homelessness for all persons seeking assistance. Determination and documentation of eligibility must be based on homeless status at intake; intake is the time the individual or family enters the project and begins receiving assistance under the grant program.

Unless otherwise noted, the general order of priority for obtaining evidence is third-party documentation first, intake worker observations second, and certification by the person seeking assistance third. However, for homeless assistance projects that provide emergency assistance, such as emergency shelter and street outreach, a lack of third-party documentation must not prevent an individual or family from being immediately admitted. Persons seeking emergency assistance may certify his/her homelessness via sign-in sheet.

<i>Table 7.1</i>		<i>Homeless Verification - Documentation</i>	
Cat.	Description	Component	Documentation
1	Literally Homeless	<i>Emergency Shelter</i> <i>Rapid Rehousing</i> <i>Transitional Housing</i> <i>Permanent Supportive Housing</i>	1. Written observation by outreach worker of the conditions where the individual or family is living; OR 2. Written referral by another housing or service provider; OR 3. Certification by the household seeking assistance/self-declaration*. 4. For households exiting an institution – one of the above AND discharge paperwork or written/oral referral, OR written record of intake worker's due diligence to obtain evidence AND self-declaration* by individual that they exited institution.

2	Imminent Risk of Homelessness	<i>Emergency Shelter</i> <i>Prevention</i> <i>Transitional Housing</i>	1. Court order resulting from an eviction action notifying the household they must leave; OR 2. For household leaving hotel/motel that they were paying for, evidence that they lack the financial resources to stay; OR 3. Documented and verified oral statement; AND <ul style="list-style-type: none"> a. Certification that no subsequent residence is identified; AND b. Self-declaration* or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
4	Fleeing/Attempting to Flee Domestic Violence	<i>Emergency Shelter</i> <i>Prevention</i> <i>Transitional Housing</i>	<p>For victim service providers:</p> <p>Self-declaration/oral statement by the household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. The statement must be certified by intake worker.</p> <p>For non-victim service providers:</p> <p>1. Self-declaration/oral statement by household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources.</p> <p>2. If the household is not jeopardized, the oral statement that the household is fleeing must be verified by intake worker or by written referral by an organization from which assistance was sought for domestic violence.</p>
<p>*Self-Declarations must generally be accompanied by intake worker documentation of due diligence to obtain third-party verification.</p>			

Due Diligence

Written documentation of due diligence must describe efforts to obtain third-party documentation (e.g. phone logs, email correspondence, copies of certified letters), and must be signed and dated by intake staff as true and complete.

Due diligence is not defined by HUD; locally, it is interpreted to mean making reasonable attempts to obtain third-party documentation. Intake workers must document these reasonable attempts, the outcome of the effort, and obstacles encountered. "Reasonable attempts" means that the intake worker, with the assistance of the applicant, creates a comprehensive list of third parties who may have knowledge of the applicant's homelessness, and that more than one (1) attempt was made to contact each identified third-party.

c. Disability Verification

<i>Table 7.2</i>	<i>Disability Verification</i>
1. Written verification of the disability from a professional licensed* by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently; OR	
2. Written verification from the Social Security Administration; OR	
3. The receipt of a disability check; OR	
4. Intake staff-recorded observation of a disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence (as outlined in this table number 1, 2, 3 or 5)**; OR	
5. Other documentation approve by HUD.	
<p>*An exception to the licensing requirement is made only for persons certified as a Chemical Dependency Professional (CDP), as defined in Chapter 18.205 RCW; this exception does not extend to a certified Chemical Dependency Professional – Trainee (CDP-T).</p> <p>**Recipients are discouraged from admitting participants into their project without confirmation of a qualifying disability and documented evidence of that disability. Recipients that choose to admit participants under Category 4 of the table above, do so at their own risk. If confirmation of disability and evidence are not attained within 45 days, the recipient will not be reimbursed for costs incurred for that participant.</p>	

d. Special Considerations for Documenting Chronic Homelessness

For each person applying to the project, written documentation must be provided by an appropriate third party that verifies the person's status as chronically homeless. Letters may be written and signed by either homeless shelter providers, homeless outreach workers or other homeless service providers. An HMIS printout that demonstrates that the individual or family meets the criteria for chronic homelessness may be substituted for a letter. Letters and HMIS printouts must:

- ✓ Be on letterhead stationery with the name, address and phone number of the agency;
- ✓ Contain the full name of the participant;
- ✓ Contain dates verifying the timeframe of homelessness including both a start date and completion date; and
- ✓ Be signed by a staff member whose title appears on the letter.

If all other efforts to obtain third-party documentation have been exhausted and unsuccessful, a participant self-declaration may be used in the absence of any other documentation. However, this should be a rare exception; recipients must document their attempts to obtain documentation in order to demonstrate due diligence and must document the situation in which the individual has been living. Self-declarations should be used only in the rarest and most extreme cases (e.g. where the individual has been in a place not meant for human habitation in a secluded area without any contact with anyone for that period). For at least 75 percent of the chronically homeless households assisted by a recipient in a project during an operating year, no more than three (3) months of living on the streets or emergency shelter may be documented by self-declaration.

Recipients should expect that chronic homeless documentation for the majority of participants will be pieced together from several sources.

i. Documenting Duration of Homelessness

To properly document the length of time homeless, documentation must include the start and end date of each occasion of homelessness.

<i>Table 7.3</i>	<i>Documenting Duration of Homelessness</i>
Definition	Documentation
Continuous, for at least twelve (12) months: On the streets or emergency shelter continuously, without a break, for at least twelve (12) months.	At least nine (9) of the 12 months must be documented through third-party documentation for at least 75 percent of the chronically homeless households assisted in a project during an operating year. Breaks in homelessness may be documented through self-certifications.
At least four (4) separate occasions in the last three (3) years: On the streets or emergency shelter on four (4) separate, distinct, and sustained occasions in the last three (3) years.	<u>NOTE: third-party documentation of a single encounter with a homeless service provider on a single day within one (1) month is sufficient to consider an individual as homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter for the entire calendar month (e.g., a documented encounter on May 5, 2015, counts for May 1 to May 31, 2015).</u>

ii. Documenting Disability

Refer to Disability Verification, [Table 7.2](#) above.

iii. Documenting Severity of Service Needs for Prioritization

Chronically homeless individuals or families with the most severe service needs must be [prioritized](#) for permanent supportive housing projects. Severe service needs must be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool that can identify the severity of needs, such as the Investing in Futures Housing Assessment. This determination must be based on the severity of the needs of the individual, not on a specific diagnosis or disability type.

Further information regarding documenting Chronic Homelessness can be found in HUD's Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing, located at:

<https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>.

Refer also to HUD's Defining Chronic Homelessness Final Rule, located at: <https://www.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>.

VIII. Changes in Household Composition

Projects are frequently targeted to serving specific homeless populations and/or subpopulation(s) per the project application, contract, and/or applicable regulations. For instance, one project may be targeted to serve homeless individuals while another may be targeted to serve homeless families with children. Please note that in targeting services to a specific population, recipients must comply with all applicable fair housing and civil rights laws. Occasionally, a household that is enrolled in the project subsequently desires to change their household composition (e.g., add or remove a household member). Recipients must follow these policies and procedures in approving or disapproving requests to change household composition.

For the purposes of these Local Standards, the following definitions apply.

Table 8.1		Applicable Definitions	
Definition	Description		
Family	Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any <i>group of persons</i> presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. Refer also to Section III.b.iv, Discrimination Based on Household Composition .		
	Projects serving families may be targeted to serve households with children, households without children, or households with only children; however, projects may not discriminate against homeless households with children.		
	A household with children is composed of at least one adult and one child (minor under the age of 18).	A household without children is composed of multiple adults, but no children under the age of 18.	A household with only children is composed of multiple persons, all of whom are under age 18.
Individual	An individual is a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person.		
	Projects serving individuals may be targeted to serve households without children or households with only children; however, projects may not discriminate against homeless households with children.		
	A household without children is composed of a single adult only.		A household with only children is composed of a single person under age 18.

a. Documenting Homelessness

At project entry, intake staff *must* obtain documentation of homelessness (or chronic homelessness) for the head of household (or other household member, as applicable) in order to establish eligibility. After enrollment, new household members *may* be permitted to join the household. However, minimum considerations should be taken into account. Refer to Section VIII.b, [Household Composition Considerations](#).

If the original household seeks to add member(s) to the household, intake staff should, to the extent possible, obtain documentation of homelessness (or chronic homelessness) for any new members of the household. This is particularly important in the event of a household break-up subsequent to enrollment: the project is permitted to continue serving (albeit separately) those household members that continue to need the housing/services offered and whose eligibility was documented at entry.

b. Household Composition Considerations

Changes in household composition raise several issues that must be considered prior to permitting the change. Refer to the Table below for examples of minimum considerations.

<i>Table 8.2</i>	<i>Minimum Considerations</i>
Consideration	Description
Fair Housing	Projects must follow fair housing laws and requirements. Refer to Section III.b., Fair Housing and Equal Opportunity .
Eligibility	The new family member(s) need not meet the eligibility requirements of the project, unless expressly required by the application, contract, or regulation, as long as the head of household's eligibility was documented at entry. Refer to Section VI, Participant Eligibility .
Terms of Occupancy	The terms of occupancy (i.e., lease agreement) must not prohibit a change in household composition. Refer to Section XIII.e, Housing Agreements .
Housing Requirements	The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII, Housing Requirements .
Rent or Occupancy Charges	The income of all household members must be considered where participants pay rent or an occupancy charge. Refer to Section X., Determining Income and Calculating Participant Rent .

c. Transfers to Suitable Units

If a change in household composition causes the unit to be unsuitable (i.e., of unsuitable dwelling size, etc.), transfers to a suitable unit may be made within the same project. If the recipient cannot accommodate the household within the same project, the recipient must contact Snohomish County for further guidance.

IX. Shared Housing

Projects may serve separate families in a shared housing situation; this is a situation where a family chooses to live in a unit with another family, both of whom do not wish to be considered together as one (1) family. This type of shared housing situation may be particularly appealing for participants of rapid rehousing projects, where the goal is for participants to maintain housing without an ongoing subsidy.

For shared housing situations, the following requirements must be followed.

<i>Table 9.1</i>	<i>Shared Housing Requirements</i>
Requirement	Description
Choice	The decision to live in shared housing must be the families' choice. The separate families must also determine that they do not wish to be considered together as one (1) family.
Eligibility	For all project types, with the exception of rapid rehousing, each family must be eligible for the project (except for reasonable accommodations). For rapid rehousing projects, only the assisted family must be eligible. In a rapid rehousing project where an eligible family shares a housing unit with an ineligible family, assistance may not be provided on behalf of an ineligible family. Refer to Section VI, Participant Eligibility .
Housing Requirements	The unit must meet all applicable housing requirements, such as suitable dwelling size. Refer to Section XIII.
Unit Rent	The cost and size of the unit must be reasonable and appropriate. Refer to Section XIII.d., Rent Reasonableness and Fair Market Rent .
Rent or Occupancy Charges and Rent Subsidies	Where participants pay rent (or an occupancy charge) or receive a rent subsidy, each family's rent/rent subsidy will be calculated separately. The income of all family members must be considered where participants pay rent or an occupancy charge. Refer to Section X., Determining Income and Calculating Participant Rent .

X. Determining Income and Calculating Participant Rent

a. Income Definition

Income must be calculated in accordance with 24 CFR § 5.609. Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member, and are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and which are not specifically excluded in 24 CFR § 5.609(c). Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits, (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed. A copy of a recent bank statement indicating direct deposit is also acceptable.

b. Income Inclusions Examples

<i>Table 10.1</i>		<i>Income Inclusions Examples</i>
		<i>Not an exhaustive list; refer to 24 CFR § 5.609(b)</i>
(1)	The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;	
(2)	The full amount of periodic payments received from social security, annuities, insurance policies, retirement funds, pensions, disability or death benefits and other similar types of periodic receipts, including lump sum payment for delayed start of a periodic payment;	
(3)	Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay;	
(4)	Welfare assistance. Welfare or other payments to families or individuals, based on need, that are made under program funded, separately or jointly, by Federal, State or local governments (e.g., Social Security Income (SSI) and general assistance available through state welfare programs);	
(5)	Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from persons not residing in the dwelling;	
(6)	Net income from the operation of a business or profession;	
(7)	Interest, dividends, and other net income of any kind from real and personal property;	
(8)	All regular pay, special pay and allowances of a member of the Armed Forces, except special hostile fire pay.	

c. Income Exclusions

Table 10.2	Income Exclusions
<i>Not an exhaustive list; refer to 24 CFR § 5.609(c)</i>	
(1)	Income from employment of children (including foster children) under the age of 18 years;
(2)	Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
(3)	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);
(4)	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
(5)	Income of a live-in aide, as defined in 24 CFR § 5.403;
(6)	Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;
(7)	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
(8)	Amounts received under training programs funded by HUD;
	Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
	Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, child care, etc.) and which are made solely to allow participation in a specific program;
	Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;
	Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;
(9)	Temporary, nonrecurring or sporadic income (including gifts);
(10)	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
(11)	Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);
(12)	Adoption assistance payments in excess of \$480 per adopted child;
(13)	Deferred periodic amounts from supplemental security income and social security benefits that are received in a lump sum amount or in prospective monthly amounts.
(14)	Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;
(15)	Amounts paid by a State agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or
(16)	Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR § 5.609(c) apply.

d. Deductions

For income calculations for the purpose of determining a participant's rent or occupancy charge under the CoC Program, mandatory income deductions must be made per 24 CFR § 5.611(a).

<i>Table 10.3</i>		<i>Mandatory Deductions</i>
<i>Refer to 24 CFR § 5.611(a)</i>		
(1)	\$480 for each dependent;	
(2)	\$400 for any elderly family or disabled family;	
(3)	The sum of the following, to the extent the sum exceeds three percent of annual income:	
	(a)	Unreimbursed medical expenses of any elderly family or disabled family; and
	(b)	Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; and
(4)	Any reasonable child care expenses necessary to enable a member of the family to be employed or to further his or her education.	

e. Income Review Requirements

Refer to Section X.g., [Calculating Rent](#), for further detail. For projects providing rental assistance, participants must agree to supply the information or documentation necessary to verify the participant's income. Participants must also provide the recipient with information at any time regarding changes in income or other circumstances that may result in changes to a participant's contribution toward rent. Refer to 24 CFR § 578.77(c)(3).

<i>Table 10.4</i>		<i>Income Review Requirements</i>
Funding	Activity	Frequency
ESG	Rental Assistance	Initially, annually and as changes in income are identified
CoC	Leasing	Initially, annually and per tenant request for change in household composition or decrease in income
	Operating	
	Rental Assistance	Initially, annually and as changes in income are identified

f. Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- ✓ Hourly Wage multiplied by Hours Worked per Week multiplied by 52 weeks
- ✓ Weekly Wage multiplied by 52 weeks
- ✓ Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- ✓ Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods

- ✓ Monthly Wage multiplied by 12 months

Standards and procedures for documenting income are further detailed in [Appendix A: Income Eligibility Documentation Standards](#).

g. Calculating Rent (or Occupancy Charge)

Guidelines for charging participants rent (or an occupancy charge) are dependent on the funding source, component, and activity type. While participants *must* be charged rent in some circumstances (i.e., CoC-permanent supportive housing providing *rental assistance*), participants *may* be charged rent in other circumstances (i.e., CoC-*leased* permanent supportive housing); however, under no circumstances may participants be charged a “program fee.” A program fee includes any fee assessed by the recipient other than rent (or an occupancy charge); examples include: fees for laundry or cleaning services, child care, transportation, or case management.

Table 10.5		Rent (or Occupancy Charge) Calculations		
Funding	Component	Activity	Required to Charge Rent?	Calculation
ESG	Rapid Rehousing	Rental Assistance	Yes	According to Rapid Rehousing Guide .
	Prevention	Rental Assistance	Yes	Prevention projects must use a Graduated Subsidy Model. Policies will be developed at the time that the Everett/Snohomish County Continuum of Care chooses to fund projects under this component.
CoC	Rapid Rehousing	Rental Assistance	Yes	According to Rapid Rehousing Guide .
	Transitional Housing or Permanent Supportive Housing	Leasing	No, but may	May not exceed the highest of (<i>rent may not be rounded up</i>): 1) 30 percent of the family’s monthly adjusted income; 2) 10 percent of the family’s monthly income; or 3) If the family is receiving payments for welfare assistance from a public agency and a part of such payments, adjusted in accordance with the family’s actual housing costs, is specifically designated by such agency to meet the family’s housing costs, the portion of such payments which is so designated.
		Operating	No, but may	
		Rental Assistance	Yes	Rent must be calculated in accordance with section 3(a)(1) of the U.S. Housing Act of 1937 (42 USC 1437a(a)(1)): A family shall pay as rent the highest of the following amounts, <i>rounded to the nearest dollar</i> : A) 30 percent of the family’s monthly adjusted income; B) 10 percent of the family’s monthly income; or C) If the family is receiving payments for welfare assistance from a public agency and a part of such

				payments, adjusted in accordance with the family's actual housing costs, is specifically designated by such agency to meet the family's housing costs, the portion of such payments which is so designated.
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h. Utility Allowances

In calculating participant rent or occupancy charges, a utility allowance must be applied where the cost of utilities (excluding telephone, but including gas, oil, electric, sewage, water, or trash removal) are not included in the rent. The local Public Housing Authority (PHA) establishes the [utility allowance schedule](#) annually for Snohomish County. Apply the utility allowance for the appropriate unit size and building type. Refer to Section XIII.b., [Suitable Dwelling Size](#).

This requirement is not applicable for ESG-Rapid Rehousing.

Utility Reimbursements under the CoC Program

Recipients must reimburse participants for any amount that the reasonable tenant-paid utility costs (per the PHA's [utility allowance schedule](#)) exceeds the calculated participant rent contribution/maximum occupancy charge; refer to [CPD-17-11, Determining a Program Participant's Rent Contribution, Occupancy Charge or Utility Reimbursement in the Continuum of Care \(CoC\) Program when the Program Participant is Responsible for Utilities](#).

Utility reimbursements must be paid in one (1) of the following ways:

1. Directly to participants;

or

2. To the utility company on behalf of participants if the recipient:
 - a. Has permission of the participant; and
 - b. Notifies the participant in writing of the amount paid to the utility company on the participant's behalf.

The recipient must maintain records of the participant's permission to pay the utility company directly and notification(s) to the participant of the amount(s) paid on their behalf.

i. Program Income

Program income is considered to be any rent (or occupancy charges) and any other income that is received by the recipient directly generated by a grant-supported activity. Program income must be retained by the recipient, committed to the project, and used to cover any eligible costs (not limited to the costs identified in the project budget). For ESG-projects, program income may be used to meet the match requirement. By contrast, for CoC-projects, program income generally may *not* be used to meet the match requirement; however, for designated fiscal year awards, HUD has permitted program income to be used as match, so long as the funds are expended on eligible CoC Program costs that supplement the recipient's project. Check with Snohomish County for further guidance.

XI. Termination of Participation, Denial and Grievance Procedures

Recipients must have written termination, denial, and grievance policies and/or procedures. The policies and/or procedures should be readily available to applicants and participants of assistance. With the exception of high volume shelters where it is acceptable to have policies posted in a public place, applicants and participants must receive written information about program policies. It is important to effectively communicate these policies and/or procedures to ensure that they are fully understood.

✓ Denial and Grievance

Causes of denial of assistance include, but are not limited to, the person's ineligibility or failure to provide verifiable evidence of eligibility, etc. Established procedures should describe:

- Circumstances in which persons may not qualify or would be denied;
- Notification of denial; and
- A person's right to review a recipient's decision.

✓ Termination of Participation and Grievance

Involuntary termination from any project funded under the HEARTH Act places the participant at great risk because (s)he will likely exit to a place that is less safe than the project in which (s)he is currently participating. Termination is a last option. Recipients are encouraged to limit rules of participation to only that which constitutes immediate danger. For example, in a communal living project, it would not be appropriate to terminate a participant's housing because (s)he did not complete her/his chores. Recipients are encouraged to find other strategies to increase participants' contributions to their community by encouraging engagement rather than threatening loss of housing.

That being said, there may be instances where termination cannot be avoided. The written grievance procedure must include:

- Written notice to the participant containing a clear statement of the reason(s) for termination;
- A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision. This may include the participant's right to question or confront staff involved; and
- Prompt written notice of the final decision.

For projects where participants are required to request a review of the termination decision, participants must be given an adequate amount of time to submit their request. The review must be held at a mutually agreeable time.

XII. Confidentiality of Participant Records

Recipients must have policies and/or procedures to ensure that participant records, including electronic records, are maintained in a confidential manner as per RCW 43.185C.030, 24 CFR § 578.103(b), and 24 CFR § 576.500(x), and keep records or files pertaining to participants under lock and key with designated personnel only granted access to those documents. All records that contain protected identifying information (e.g. Name, Social Security Number, Date of Birth, etc.) of persons applying for and/or receiving housing and/or services must be kept secure and confidential.

The procedures must also ensure that the address or location of any family violence project will not be made public, except with written authorization of the person responsible for the operation of the project; and that the address or location of any housing of a participant will not be made public, except as provided under a preexisting privacy policy of the recipient and consistent with State and local laws regarding privacy and obligations of confidentiality.

XIII. Housing Requirements

a. Inspection Requirements

All housing assisted with ESG and CoC Program funds must meet the minimum housing standards; housing standards vary by Program and component type.

i. Emergency Shelter (ESG)

Projects that receive ESG funds for shelter operations must comply with minimum safety, sanitation and privacy standards as outlined in 24 CFR § 576.403. Inspections to ensure compliance must be done before assistance is provided and at least annually.

ii. Rapid Rehousing (ESG)

Projects providing ESG-Rapid Rehousing assistance are required to perform Habitability Standards inspections and maintain documentation of these inspections as defined in 24 CFR § 576.403(c). These inspections must be done before assistance is provided and at least annually. Recipients of ESG-Rapid Rehousing may adopt more stringent requirements that exceed or add to the requirements in 24 CFR § 576.403(c). HUD Housing Quality Standards (HQS) inspection procedures *are not* considered sufficient because HQS is less stringent in the areas of fire safety and interior air quality. However, the HQS form may be amended to include the more stringent safety and interior air quality requirements. A record of the inspections must be kept for each assisted unit and must be readily available.

iii. Transitional Housing, Permanent Supportive Housing, Rapid Rehousing (CoC)

All CoC-housing, including transitional housing, permanent supportive housing, and rapid rehousing must meet applicable housing quality standards (HQS) under 24 CFR § 578.75(b). HQS requirements are contained within [24 CFR § 982.401](#), which state the performance and acceptability criteria for the key aspects of housing quality listed in [Table 11.1](#).

Snohomish County has adopted more stringent requirements for Interior Air Quality than those contained in 24 CFR § 982.401, and requires that all units have carbon monoxide detectors in compliance with WAC 51-51-0315. A carbon monoxide detector must be installed

outside of each separate sleeping area in the immediate vicinity of the bedrooms and on each occupied level of the unit.

<i>Table 13.1</i>		<i>Housing Quality Standards – Key Aspects</i>	
Sanitary facilities		Food preparation and refuse disposal	
Space and security		Thermal environment	
Illumination and electricity		Structure and materials	
Interior air quality		Water supply	
Access		Site and neighborhood	
Sanitary condition		Smoke detectors	

Physical inspections of units to ensure compliance with HQS must be completed prior to the issuance of assistance. Additionally, recipients must inspect all units at least annually (at least every twelve (12) months) to ensure ongoing compliance with HQS. Deficiencies must be remedied within thirty (30) days of inspection, with the exception of emergency failures, which must be corrected within twenty-four (24) hours, see below. Payment may not be issued beyond the annual recertification date for units that do not meet HQS.

For housing leased with CoC Program funds, or for which rental assistance payments are made with CoC funds, recipients must comply with applicable conflict of interest requirements and shall not conduct HQS inspections of property that the recipient or a related entity owns. See 24 CFR § 578.95(c).

Emergency Fails

The following deficiencies constitute an emergency fail and repairs must occur and be verified within twenty-four (24) hours (rather than the standard thirty (30) days) of inspection (24 CFR 982.401(a)).

- Lack of security for the unit
- Waterlogged ceiling in imminent danger of falling
- Major plumbing leaks or flooding
- Natural gas leaks or fumes
- Electrical problem which could result in shock or fire
- No heat when outside temperature is below 40°F and the temperature inside the unit is below 55°F
- Utilities not in service
- No running hot water
- Broken glass where someone could be injured
- Obstacle which prevents entrance or exit
- Lack of functioning toilet
- Inoperable smoke detector

b. Suitable Dwelling Size

Recipients must establish guidelines for establishing the appropriate unit size; these guidelines must be applied consistently for all participants of like size and household composition. Agency

standards cannot have a disproportionate impact on specific family composition (i.e., non-traditional households).

Participants must be placed in units that are of suitable size: the unit must have at least one (1) bedroom or living/sleeping room for each two (2) persons. 24 CFR § 578.75(c). Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or living/sleeping room. 24 CFR § 578.75(c)(1).

Participants should be assisted in choosing a unit with the smallest number of bedrooms needed without overcrowding. Except in limited circumstances (i.e., request for reasonable accommodation, etc.), participants should not be assisted in units with a greater number of bedrooms than is needed.

If household composition changes during the term of assistance, households should be assisted in relocating to a more appropriately sized unit and continue to access appropriate services. 24 CFR § 578.75(c)(1). Refer also to Section VIII.c, [Transfers to Suitable Units](#).

c. Lead-Based Paint Requirements

Recipients must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and the regulation at 24 CFR § 35. The applicable parts of 24 CFR § 35 are as follows:

1. For ESG-funded shelters and housing occupied by project participants, recipients must comply with subparts A, B, H, J, K, M and R.
2. For CoC-funded housing that receives project-based or sponsor-based rental assistance, recipients must comply with subparts A, B, H, and R.
3. For CoC-funded housing that receives tenant-based rental assistance, recipients must comply with subparts A, B, M, and R.
4. For CoC-funded residential property receiving leasing, services or operating costs, recipients must comply with subparts A, B, K and R.

i. Lead Hazard Information Pamphlet

Recipients must ensure that all participants who reside in housing that was constructed pre-1978 receive the “Protect Your Family” lead-based paint hazard brochure; this form is available at: <http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>. Sharing this information with participants (or ensuring they have received it from property owners/managers) is an important opportunity to educate participants about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

ii. Disclosure

In addition, owners of pre-1978 housing must disclose the presence of lead-based paint and provide participants with any existing documentation on known lead-based paint hazards in the unit. Recipients must document that participants received this information and maintain this documentation in the participant files; this form is available at: <http://www.hud.gov/offices/lead/enforcement/disclosure.cfm>.

iii. Visual Assessments

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. Refer also to [Appendix B: Step by Step Guide to Compliance with Lead Based Paint Visual Assessment Requirements](#).

A lead-based paint visual assessment must be completed for all units that meet the following conditions:

1. The household is moving into or remaining in a unit that is being assisted with either ESG or CoC funds; and
2. The unit was constructed prior to 1978.
3. For ESG- and CoC-tenant-based rental assistance, there must also be a child under the age of six (6) or a pregnant woman who is, or will be, living in the unit.

For units and facilities that meet these conditions, recipients must conduct a visual assessment at least annually. For rental units, a visual assessment must be conducted prior to providing rent assistance and on an annual basis thereafter (as long as assistance is provided). The recipient must maintain the inspection record in each participant's file.

Visual assessments must be conducted by a [HUD-Certified Visual Assessor](#). Agency staff may complete the Visual Assessment Training at <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. The certificate of completion must be maintained on record and be readily available for review. For rental units, documentation must be kept with the HQS or Habitability Standards Worksheet, as applicable, and maintained in the participant file.

iv. Exemptions to the Requirement

There are certain exemptions to the lead-based paint requirements in the following circumstances:

- It is a residential property for which construction was completed on or after January 1, 1978.
- It is a zero-bedroom or SRO-sized unit; or
- It meets any of the other exemptions described in 24 CFR § 35.115(a).

If any of the conditions outlined above are met, recipients need to document the condition to demonstrate that the unit is exempt from the lead-based paint requirements.

d. Rent Reasonableness and Fair Market Rent

Where applicable, adherence to rent reasonableness and/or Fair Market Rent (FMR) must be determined before assistance is provided and no less than annually.

When determining rent reasonableness and Fair Market Rent, recipients must compare the unit's gross rent with the applicable standard. Gross rent includes the entire housing cost: rent plus the cost of any utilities that must (according to the lease) be the responsibility of the tenant. Utilities include gas, oil, electric, water, sewer, and trash, and exclude telephone, cable, or satellite television service, and internet service.

Rent Reasonableness

All ESG- and CoC-units and structures for which rent is paid must be reasonable in relation to rents being charged for comparable unassisted units in the same market; reasonable rents must also not exceed rents currently being charged by the same owner for comparable unassisted units. Refer to the Rent Reasonable Policies and Procedures, Attachment B, for further guidance.

Fair Market Rent

Annually (effective October 1), HUD determines Fair Market Rent (FMR) by geographic area; FMRs are based on the results of a local rent survey and reflect the gross rent estimates. Snohomish County falls within the Seattle-Bellevue, WA HUD Metro FMR Area.

FMRs are published here: <http://www.huduser.gov/portal/datasets/fmr.html>

<i>Table 13.2</i>		<i>Unit Rent Standard By Component</i>	
Activity	Funding	Requirement	Frequency of Review
Leasing	CoC	Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be leased with CoC funds. Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent <i>may</i> exceed FMR; however, the amount paid with CoC-leasing funds may not exceed the current published FMR. Therefore, if the gross rent exceeds FMR, CoC leasing funds may pay for a portion of the rent up to the FMR amount and the difference must be paid with other, non-CoC funds. Maximum CoC-Leasing Payment The maximum amount of rent that can be paid for with CoC-leasing funds is the lower of the rent reasonableness standard and FMR.	Initially, Annually
Rental Assistance	CoC	Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be assisted with CoC-rental assistance funds. Fair Market Rent As long as the unit's gross rent is rent reasonable, the gross rent and the amount paid with CoC-rental assistance funds <i>may</i> exceed FMR. Maximum CoC-Rental Assistance The maximum amount of rental assistance that can be paid for with CoC-funds is the rent reasonableness standard.	Initially, Annually

Rental Assistance	ESG	<p>Rent Reasonable The unit's gross rent must be rent reasonable. Units with gross rents that exceed rent reasonableness standards may not be assisted with ESG-rental assistance funds.</p> <p>Fair Market Rent The unit's gross rent must be equal to or less than the FMR. Units with gross rents that exceed FMR may not be assisted with ESG-rental assistance funds.</p> <p>Maximum ESG-Rental Assistance The maximum amount of rental assistance that can be paid for with ESG-funds is the lower of the rent reasonableness standard and FMR.</p>	Initially, Annually
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e. Housing Agreements

Different types of housing agreements are required depending on the component and activity.

i. Lease Agreements

Participants must have a written lease agreement with the landlord/owner of the housing unit (or for CoC-leasing projects, a written sublease with the recipient). For CoC-permanent housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one (1) year that is renewable (for a minimum term of one (1) month) and terminable only for cause. For CoC-transitional housing, in addition to the minimum requirements listed below, the lease must be for a term of at least one month that ends in 24 months and cannot be extended.

At a minimum, written lease agreements must contain:

- Name of participant
- Name of landlord/owner
- Address of dwelling unit
- Occupancy (who is permitted to live at the dwelling unit)
- Term of agreement (lease start and end dates)
- Dwelling unit rent and date due
- Deposits (if any, and for what/term)
- Signature of participant/date
- Signature of landlord/owner/date

ii. Master Lease Agreements (CoC Leasing)

Where units or structures are leased with CoC leasing funds, the recipient must have a master lease agreement with the landlord/owner. For CoC-leasing projects, the lease agreement between the recipient and participant is a sublease agreement; therefore, the master lease agreement must permit subleases. The master lease must be written, legally binding, and must allow the required lease agreement provisions (as described above) to be met.

iii. Rental Assistance Agreements (ESG- and CoC-Rental Assistance)

Recipients may make rental assistance payments only to landlords/owners with whom the recipient has a rental assistance agreement. The rental assistance agreement must include the terms under which rental assistance will be provided, the term of the agreement, that the landlord/owner will provide the recipient with a copy of all written notices to the participant (including notices to vacate, notices of noncompliance, etc.). For a sample rental assistance agreement, refer to Attachment D.

XIV. Recordkeeping Requirements

In order to receive assistance, the following information must be documented in the participant file. Documentation must be retained for five (5) years after the expenditure of all funds from the grant under which the participant was served, unless a greater period of time is specified in the contract.

a. Initial Consultation & Eligibility Determination

The participant must lack sufficient resources and support networks to obtain/retain housing and this must be documented in the file. The participant must receive an initial consultation and eligibility assessment to determine housing status eligibility (and other eligibility requirements, as applicable) and the appropriate type of assistance needed to regain stability in permanent housing.

b. Income and Participant Rent

Please see Section X, [Determining Income and Calculating Participant Rent](#), for full detail. Income documentation and completed calculations of participant rent must be maintained in each participant file; forms must be signed and dated by the staff person who completed the calculation.

c. Housing Stability Plan

The Housing Stability Plan (ESG-Emergency Shelter, ESG-Prevention, CoC- and ESG-Rapid Rehousing) must include:

- ✓ Needs assessment to identify barriers and specific housing and self-sufficiency goals
- ✓ Action steps to retain permanent housing after assistance ends
- ✓ Households receiving assistance from a victim service provider may be exempted from the case management requirement.

d. Individual Support Plan

The Individual Support Plan (CoC-Transitional Housing and CoC-Permanent Supportive Housing) must include:

- ✓ Problem Identification
- ✓ Goals
- ✓ Action Plan
- ✓ Outcomes

Per 24 CFR § 578.53, projects must complete an assessment of the service needs of participants at least annually. Services must be adjusted accordingly.

e. Assistance in obtaining mainstream and other resources

Participants must receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance.

f. Proof of Complete Inspection

Please see Section XIII, [Housing Requirements](#), for full detail.

- ✓ [Habitability](#) (ESG)
- ✓ [Housing Quality Standards](#) (CoC)

Completed inspection forms must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

g. Proof of Complete Lead Based Paint Visual Assessment

See Section XIII, [Housing Requirements](#), for full detail. Completed assessments must be retained in the file and must contain the date the inspection was performed and the signature of the staff person who performed the inspection.

h. Rent Reasonableness and Fair Market Rent

See Section XIII, [Housing Requirements](#), for full detail.

Rent Reasonableness

Documentation of rent reasonableness ensures that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market. Please see the Rent Reasonableness Policies and Procedures, Attachment B, for further detail.

Recipients must maintain in each participant file:

- ✓ Rent Reasonableness Certification Form (Attachment C) to document rent reasonableness; and
- ✓ As applicable, Rent Reasonableness Certification – Supplemental Analysis form (Attachment C) used to compare rents on a unit-by-unit basis

In addition, recipients must maintain a copy of:

- ✓ Dupre + Scott Snohomish County Rent Reasonableness Survey, which is published annually

Fair Market Rent

Recipients must ensure that participant files contain applicable FMR data to document the FMR for the participant's unit size and geographic area.

Recipients must:

- ✓ Use the Rent Reasonableness Certification Form (Attachment C) to document FMR

i. Housing Agreements

See Section XIII, [Housing Requirements](#), for full detail. Fully executed housing agreements must be maintained for each unit that is assisted.

j. Case Notes and Record of Services Received

Files must contain case notes that align with either the Housing Stability Plan or the Individual Support Plan, be legible, dated and contain a record of the staff member responsible for each note.

XV. Reporting Requirements

Subrecipients shall follow the reporting requirements as outlined in the Contract with the County. The County reserves the right to request additional information or prescribe or change reporting requirements.

Recipients shall participate in Snohomish County Continuum of Care activities, which include participation in planning activities, the annual Point-in-Time (PIT) count of individuals and families experiencing homelessness, and completion of the annual Housing Inventory Count (HIC), which includes project data on beds, units, HMIS participation, services, and financial expenditures.

An Annual Performance Report (APR) is currently required for the CoC Program. With the exception of Victim Service Providers, which are required to track required data in a comparable database, the majority of the data required for the APR will be generated from the Snohomish County Homeless Management Information System (HMIS). Recipients are required to report on financial data and provide narratives regarding project performance.

XVI. Homeless Management Information Systems Participation

Recipients will participate in the [Snohomish County Homeless Management Information System](#) (“Snohomish County HMIS”), which is administered by the County’s Human Services Department. The Snohomish County HMIS is an electronic database that collects data on persons experiencing homelessness who receive coordinated entry, navigation services, outreach, homelessness prevention and intervention services, emergency shelter, transitional housing, supportive services not linked with housing, and permanent housing, including rapid rehousing, permanent supportive housing, and other permanent housing.

HMIS Participation will include:

- Technical set up;
- Staff training;
- Development and adherence to an HMIS implementation schedule;
- Adherence to the requirements set forth in the Local HMIS Data Quality Plan, including timely data entry, internal monitoring of data quality, and timely correction of data;
- Adherence to requirements as set forth in the [Snohomish County HMIS Policy and Procedures Manual](#); and
- Adherence to the requirements set forth in the “Agency Partner Agreement” and “User Policy, Code of Ethics and Responsibility Statement” executed by the Recipient and the Recipient’s staff.

XVII. Performance Standards

The Partnership to End Homelessness (PEH) CoC Board has delegated authority to Snohomish County, as the Collaborative Applicant (CA) and HMIS Lead, to establish performance standards for CoC- and ESG-funded projects in consultation with its Subrecipients. Performance standards are established by project type, based upon HUD’s national targets, as well as local targets that account for the unique needs of the homeless population and subpopulations within the Everett/Snohomish County CoC. To set these performance targets, the County reviews HUD established performance areas, including those for High-Performing Communities and those included in the application review criteria in the CoC Program Notice of Funding Availability (NOFA), as well as HMIS and performance data for CoC- and ESG-funded projects. See the Everett/Snohomish County Continuum of Care Performance Standards, incorporated herein by reference, which are posted to the [PEH CoC Board webpage](#).

The County will monitor project performance on an ongoing basis through HMIS data as well as annually through the Annual Performance Report (APR). In addition:

- Annually, for CoC-funded projects, after HUD has published the Notice of Funding Availability (NOFA), the Project Review Committee (PRC) scores projects locally and recommends projects for funding. See *Section II, [Policy on Project Selection](#)*. Project data, including project performance, is compiled for County and PRC review.
- Once Subrecipients are selected and projects begin operating, the County utilizes a Program Monitoring Tool – Subrecipient Risk Assessment to assess whether Subrecipients qualify as “high risk,” which is determined, in part, by a review of project performance.

The County will take the following action against poor performers:

- Provide technical assistance (TA)
- Provide a corrective action plan if:
 - o TA is not implemented by the Subrecipient; or
 - o The poor performance is of serious concern; or
 - o Prior TA was not followed by the Subrecipient.
- Review all necessary materials and conduct on-site visit(s) as needed
- Follow contracting procedures for suspension or termination of the Contract if the Subrecipient fails to respond and correct the issue(s)
- Request funds be returned if necessary and appropriate.

Appendix A

Income Eligibility Documentation Standards

While Snohomish County has established standards for various types of income, the County recognizes that in some instances only applicant self-declaration may be possible. This method should be used only as a *last resort* when all other verification methods are not possible or reasonable. **When using applicant self-declaration, Projects must document why a higher verification standard was not used. Be sure to include this in the case file.**

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.

Type of Income	Acceptable Types of Documentation
Wages and Salary 24 CFR § 5.609(b)(1)	<p>Obtain copy of most recent pay stub(s) and include in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to employer. At a minimum, written verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by employer. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the employer by phone or in person. At a minimum, oral verification must include: name of employer and participant name, pay amount and frequency, average hours worked per week, amount of any additional compensation and be signed and dated by staff who obtained the information. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency, and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
Self-Employment and Business Income 24 CFR § 5.609(b)(2)	<p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>

Interest and Dividend Income 24 CFR § 5.609(b)(3)	<p>Obtain copy of most recent interest or dividend income statement from participant and keep copy in participant file.</p> <p><i>OR</i></p> <p>Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
Pension/Retirement Income 24 CFR § 5.609(b)(4)	<p>Obtain copy of most recent payment statement or benefit notice from Social Security, pension provider or other source. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to Social Security, pension provider or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
Unemployment and Disability Income 24 CFR § 5.609(b)(5)	<p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to unemployment administrator, workers compensation administrator of former employer. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: Name of income source, income amount and be signed and dated by income source</p>

	<p>representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
<p>TANF/Public Assistance 24 CFR § 5.609(b)(6)</p>	<p>Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to welfare administrator. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>
<p>Alimony, Child Support, Foster Care Payments 24 CFR § 5.609(b)(7)</p>	<p>Obtain copy of most recent payment statement, notices or orders. Copy kept in participant file.</p> <p><i>OR Written 3rd Party Verification</i></p> <p>Mail, fax or email verification of income request to child support enforcement agency, court liaison or other source. At a minimum, written verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Oral 3rd Party Verification</i></p> <p>Contact the source by phone or in person. At a minimum, oral verification must include: name of income source, income amount and be signed and dated by income source representative. Copy kept in participant file.</p> <p><i>OR Self Declaration</i></p> <p>Obtain signed and dated self-declaration from the participant. At a minimum must include source of income, income amount and frequency and be signed. Copy kept in participant file. Case manager must document attempts to obtain written and oral verification.</p>

Appendix B

Step-by-Step Guide to Compliance with Lead-Based Paint Visual Assessment Requirements

Childhood lead poisoning is a major environmental health problem in the United States, especially for low-income families in poor living conditions. If not detected early, children with high levels of lead in their bodies can suffer from damage to the brain and nervous system, behavioral and learning problems (such as hyperactivity), slowed growth, hearing problems, and headaches.

To prevent lead-poisoning in young children, recipients must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulation found at 24 CFR § 35.

Visual Assessment

Visual assessments are only triggered under certain circumstances:

- The household is moving into or remaining in a unit that is being assisted with either ESG or CoC funds; AND
- The unit was constructed prior to 1978.
- For ESG- and CoC-tenant-based rental assistance, there must also be a child under the age of six (6) or a pregnant woman who is, or will be, living in the unit.

Determining the Age of the Unit

Projects should use formal public records, such as tax assessment records, to establish the age of a unit. These records include the year built or age of the property and are available online at: <http://snohomishcountywa.gov/175/Assessor>. Assessor records should be printed for the participant file. If you have trouble finding this information online, contact Snohomish County.

Conducting a Visual Assessment

A visual assessment must be conducted prior to providing assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor. It is important to note that a HUD-Certified Visual Assessor is not equivalent to a Certified Clearance Examiner. Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.html>. Certifications must be maintained by the recipient and be readily available for review.

The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated. Projects may choose to have their program staff complete the visual assessments, or they may procure services from a contractor.

Making Assistance Determinations

If a visual assessment reveals problems with paint surfaces, Project cannot approve the unit for assistance until the deteriorating paint has been repaired. Recipients may work with the property owner/manager to complete needed paint stabilization activities and clearance, work with the household to locate a different (lead-safe) unit, or refer the participant to a different program if assistance cannot be provided.

Locating a Certified Lead Professional and Further Training

To locate a certified lead professional in your area:

- Call your state government (health department, lead poison prevention program, or housing authority).
- Call the National Lead Information Center at 1-800-424-LEAD (5323).
- Go to the U.S. Environmental Protection Agency website at <https://www.epa.gov/lead>.

Lead professionals, training providers, and HUD-sponsored Lead Safe Work Practices training listings can be accessed at www.leadlisting.org or 1-888-LEADLIST.

For more information on the Federal training and certification program for lead professionals, contact the National Lead Information Center (NLIC) at <http://www.epa.gov/lead/pubs/nlic.html> or 1-800-424-LEAD to speak with an information specialist.

The Lead Safe Housing Rule as well as a HUD training module to help recipients of funds effectively implement the requirements of the Lead Safe Housing Rule in their programs can be accessed at https://www.hud.gov/program_offices/healthy_homes/enforcement/lshr.

Appendix C

Violence Against Women Act **Written Standards**

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Appendices

- A – [Notice of Occupancy Rights under the Violence Against Women Act](#)
- B – [Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation](#)
- C – [Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#)

I. Introduction

For help for victims of domestic violence, dating violence, sexual assault, or stalking, call:
Domestic Violence Services of Snohomish County
24-hour crisis hotline: 425-25-ABUSE (425-252-2873)

a. Background

In accordance with the Violence Against Women Act (VAWA), the protections described in these VAWA Written Standards are intended to increase opportunities for individuals and families receiving assistance under certain federal programs to live in safe housing and to reduce the risk of homelessness for individuals and families who might otherwise be evicted, be denied housing assistance, or flee their homes (81 FR 80724, Executive Summary 80725).

The [2013 reauthorization of the Violence Against Women Act](#) (2013 VAWA), enacted on March 7, 2013, extended and expanded protections for victims of domestic violence, dating violence, sexual assault, and stalking (hereinafter referred to as “Survivors”). These protections apply, regardless of sex, gender identity, or sexual orientation.

It is important to note that despite the name of the Act, these VAWA Written Standards ensure protections are provided consistently for *all* individuals and families seeking assistance, ***regardless of sex, gender identity, or sexual orientation.***

Under the 2013 VAWA, these protections are now applicable to the Continuum of Care (CoC), Emergency Solutions Grant (ESG) and HOME Investments Partnership Program (HOME), which are federal programs administered by the U.S. Department of Housing and Urban Development (HUD). HUD published the [VAWA Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule](#) (81 FR 80724), effective December 16, 2016, which implements the requirements of the 2013 VAWA for applicable HUD programs.

In compliance with VAWA 2013 and the HUD Final Rule, these VAWA Written Standards detail VAWA requirements as adopted locally by the Everett/Snohomish County Continuum of Care (CoC) and the Snohomish County HOME Consortium for its CoC, ESG, and HOME Programs.

b. Purpose

The Snohomish County Division of Housing and Community Services (HCS) administers programs that provide a wide-range of community development and housing-related services to Snohomish County residents. HCS contracts with agencies (hereinafter referred to as “Agencies”) to administer these projects.

These VAWA Written Standards are intended to ensure that projects operating within the Everett/Snohomish County CoC and the Snohomish County HOME Consortium that are funded by HUD through the CoC, ESG, and HOME Programs, provide protections to Survivors in compliance with VAWA.

c. VAWA and Other Laws

VAWA protections and these Written Standards do not replace or supersede any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. (24 CFR 5.2011).

All applicable fair housing and civil rights statutes and requirements apply in the implementation of VAWA requirements. (24 CFR 5.2011).

VAWA does not limit Snohomish County's or the Housing Provider's duty to honor court orders about access or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up (24 CFR 5.2005(d)(1)).

d. Nondiscrimination and Equal Opportunity

Agencies and Owners/Landlords of housing must comply with applicable nondiscrimination and equal opportunity requirements in the operation of their programs and projects; these requirements extend to implementation of the VAWA requirements. Survivors cannot be discriminated against on the basis of any protected characteristics, including race, color, national origin, religion, sex, familial status, disability, or age. Programs and projects must also be operated consistently with HUD's Equal Access Rule at 24 CFR 5.105(a)(2), which requires that HUD-assisted and HUD-insured housing are made available to all otherwise eligible individuals and families regardless of actual or perceived sexual orientation, gender identity, or marital status (24 CFR 5.2001(a)).

e. Language and Communication Services

Agencies and Owners/Landlords of housing must comply with applicable nondiscrimination and equal opportunity requirements regarding language and communication services in the operation of their programs and projects; these requirements extend to implementation of the VAWA requirements. Agencies and Owners/Landlords of housing must ensure that they are able to communicate effectively with applicants and tenants.

Agencies and Owners/Landlords of housing must provide, upon request, reasonable accommodations to individuals with disabilities. This may include providing appropriate auxiliary aids and services (e.g. accessible formats, sign language interpreters) as well as making changes to program rules, policies, or practices necessary to ensure effective communication (e.g. reasonable accommodation to put emergency transfer request in writing).

Agencies and Owners/Landlords of housing must also take reasonable steps to ensure meaningful access to their programs for applicants and tenants with Limited English Proficiency, as needed, including, but not limited to, translation services. HUD encourages Agencies and Owners/Landlords of housing to strive to ensure that all applicants and tenants have notice of their rights under VAWA

and, to assist in this effort, HUD has translated the required [Notice of Occupancy Rights](#) and [Certification](#) into several languages.

f. **Applicability**

While these VAWA Written Standards provide consistent requirements across programs and projects, certain funding sources have specific requirements per applicable rules and regulations.¹ For funding sources with specific requirements, these Written Standards specify the funding source; for requirements that are the same for all programs and projects, these Written Standards do not distinguish between funding sources.

1. **Types of Housing**

These VAWA Written Standards apply to homeless housing interventions (Transitional Housing and Permanent Housing, including Rapid Rehousing, Permanent Supportive Housing, and Other Permanent Housing) and to HOME rental housing (Rental Housing assisted with HOME funds and HOME Tenant-Based Rental Assistance (TBRA)).

Emergency Shelters

At a minimum, Emergency Shelters must comply with the core statutory provisions provided under VAWA 2013 that prohibit denial of admission or eviction or termination to an individual solely on the basis or as a direct result of the fact that the individual is a Survivor (24 CFR 576.604(a)(2), 24 CFR 576.409(f)).

2. **Types of Activities by Funding Sources**

The funding sources² administered by HCS that have Program-specific requirements are:

Program	Type of Funding
Continuum of Care (CoC)	Acquisition, rehabilitation, new construction, leasing, rental assistance, and operating costs (24 CFR 578.99(j))
Emergency Solutions Grants (ESG)	Rental assistance and emergency shelter (24 CFR 576.409(a) and (f))
HOME Investment Partnerships (HOME)	Rental Housing Units (acquisition, rehabilitation, new construction) and Tenant-Based Rental Assistance (TBRA) (24 CFR 92.359(a))

¹ When assistance is provided under more than one (1) housing program and there is a conflict between VAWA protections or remedies under those programs, the individual seeking the VAWA protections or remedies may choose to use the protections or remedies under any or all of those programs, as long as the protections or remedies would be feasible and permissible under each of the programs (24 CFR 5.2001(b)(2); 81 FR 80724, Preamble 80734).

² For specific requirements by funding source, these VAWA Written Standards assume an advanced level of knowledge of applicable program requirements and regulations; refer also to the [Snohomish County HEARTH Local Program Standards](#) and to the Office of Housing and Community Development HOME Program Policies.

3. Period of Applicability

These VAWA Written Standards shall apply to programs and projects for the periods specified below:

Type of Funding	Period of Applicability
All Programs, except for the Programs and types of funding specified below that have Program-specific requirements	These VAWA Written Standards shall apply to the housing for the period that assistance is provided with Program funds.
CoC acquisition, construction, rehabilitation	These VAWA Written Standards shall apply to the housing for a period of 15 years from the date of initial occupancy or date of initial service provision (24 CFR 578.99(j)(5)(ii)).
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	These VAWA Written Standards shall apply to the owner of the housing for the duration of the affordability period (24 CFR 92.359(f)).

g. Definitions

The following definitions apply to these VAWA Written Standards:

Actual and Imminent Threat (24 CFR 5.2003)	<p>A physical dangers that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:</p> <ul style="list-style-type: none"> - The duration of the risk, - The nature and severity of the potential harm, - The likelihood that the potential harm will occur, and - The length of time before the potential harm would occur.
Affiliated Individual (24 CFR 5.2003)	<p>With respect to an individual, means:</p> <ol style="list-style-type: none"> (1) A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or (2) Any individual, tenant, or lawful occupant living in the household of that individual.
Dating Violence (24 CFR 5.2003)	<p>Violence committed by a person:</p> <ol style="list-style-type: none"> (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors: <ol style="list-style-type: none"> i. The length of relationship;

	<ul style="list-style-type: none"> ii. The type of relationship; and iii. The frequency of interaction between the persons involved in the relationship.
Domestic Violence (24 CFR 5.2003)	<p>Includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or who has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.</p> <p>The term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.</p>
Housing Provider	<p>Housing Providers include:</p> <ul style="list-style-type: none"> (1) Agencies that are designated as a Subrecipient of Snohomish County to administer program(s) on behalf of Snohomish County; (2) The Owner or Landlord of the housing that receives program assistance, which may include (nonprofit or for-profit) Owners/Landlords of housing in the community or Owners of HOME-assisted rental housing; and (3) For the HOME Program, Snohomish County as the Participating Jurisdiction. <p>The applicable Housing Provider varies by provision; <i>refer to each provision for further detail on the applicable Housing Provider(s).</i></p> <p>Snohomish County does not directly operate housing projects or rental assistance programs under its CoC, HOME, or ESG programs. Snohomish County has contractual relationship with covered housing providers such as agencies administering rental assistance through the CoC, HOME, or ESG programs and owners of HOME Rental Housing projects to provide this housing. Snohomish County's responsibilities include providing oversight and monitoring of these entities to assist them in fulfilling their obligations under the 2013 VAWA and to ensure compliance with these VAWA Written Standards.</p>
Sexual Assault (24 CFR 5.2003)	Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks the capacity to consent.
Stalking (24 CFR 5.2003)	<p>Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:</p> <ul style="list-style-type: none"> (1) Fear for the person's individual safety or the safety of others; or (2) Suffer substantial emotional distress.

Survivors	Victims of domestic violence, dating violence, sexual assault, or stalking.
Tenants (81 FR 80724, Preamble 80730)	<p>An assisted individual or family and the members of the household on their lease.</p> <p>Does not include guests or unreported members of a household. A live-in aide or caregiver is not a tenant, unless otherwise provided by the program.</p>

II. Confidentiality (24 CFR 5.2007(c))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC 24 CFR 578.99(j)(2)(iii)	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
ESG 24 CFR 576.409(b)(4))	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
HOME Rental Housing Units (acquisition, rehabilitation, new construction) (24 CFR 92.359(a)(2)(ii)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME TBRA (24 CFR 92.359(a)(2)(ii))	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction

a. Confidential Information

Any information submitted to a Housing Provider, including the fact that an individual is a Survivor, shall be maintained in strict confidence by the Housing Provider (24 CFR 5.2007(c)). Confidential information includes but is not limited to:

- All records containing protected identifying information of any applicant or tenant;
- The fact that an individual is a Survivor; and
- The address or location of any applicant or tenant, including the address of the new dwelling unit to which the Survivor is transferred under the [Emergency Transfer Plan](#) 24 CFR 5.2005(e)(4).

b. Protection of Confidential Information

The Housing Provider **shall not**:

1. Allow any individual administering assistance on behalf of the Housing Provider or any persons within their employ (e.g., contractors) or in the employ of the Housing Provider to have access to confidential information unless explicitly authorized by the Housing Provider for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law (24 CFR 5.2007(c)(1)).
2. Enter confidential information into any shared database or disclose such information to any other entity or individual, except to the extent that the disclosure is:
 - a. Requested or consented to in writing by the Survivor in a time-limited release;
 - b. Required for use in an eviction proceeding or hearing regarding termination of assistance from the program; or
 - c. Otherwise required by applicable law (24 CFR 5.2007(c)(2)).

III. VAWA Protections for Applicants and Tenants (24 CFR 5.2005)

Applicants and tenants protected under VAWA may invoke VAWA protections on more than one (1) occasion and cannot be subjected to additional conditions that adversely affect their tenancy because they have invoked VAWA protections. Survivors do not need to contact authorities, such as police, or initiate legal proceedings against an abuser or perpetrator to qualify for VAWA protections (81 FR 80724, Preamble 80731).

a. Notice to Applicants and Tenants (24 CFR 5.2005(a))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
All Programs, except for the Program(s) specified below that have Program-specific requirements	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
CoC (24 CFR 578.99(j)(4))	<ul style="list-style-type: none"> - Agencies
ESG (24 CFR 576.409(c))	<ul style="list-style-type: none"> - Agencies
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction) (24 CFR 92.359(c)(1))	<ul style="list-style-type: none"> - Owner/Landlord
HOME TBRA (24 CFR 92.359(c))	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Snohomish County, as the Participating Jurisdiction

Housing Providers must provide the “[Notice of Occupancy Rights under the Violence Against Women Act](#)” and “[Certification Form](#),” as described below, to all applicants and tenants at each of the three (3) following times:³

- 1) When the applicant is denied assistance from or admission to the program or project;
- 2) When the applicant is admitted into the program or project (e.g., begins receiving assistance); and
- 3) When the tenant receives any notification of eviction or notification of termination of assistance.

In addition to the requirements above, the following additional program-specific requirements apply:

Type of Funding	Additional Program-Specific Requirements
CoC Rental Assistance (24 CFR 578.99(j)(4)(ii))	Agencies must ensure that the Owner/Landlord provides the Notice and Certification with any notification of eviction. Refer also to the Housing Agreements section.
HOME TBRA (24 CFR 92.359(c)(2))	Snohomish county, as the Participating Jurisdiction, or designated Agency administering a TBRA program on behalf of Snohomish County, must also provide the Notice and Certification to a tenant receiving HOME TBRA when providing the tenant with notification of termination of the HOME TBRA, and when learning that the tenant’s housing Owner intends to provide the tenant with notification of eviction. Refer also to the Housing Agreements section.

By providing the [Notice](#) and [Certification](#) at each of the times listed above, applicants and tenants have the opportunity to assert that they are or were Survivors, and that they are eligible for VAWA protections (81 FR 80724, Preamble 80729). Housing Providers are encouraged to ensure that all adult members of a household (and not just the head of household) receive the [Notice](#) and [Certification](#) (81 FR 80724, Preamble 80772). Housing Providers are also encouraged to post the [Notice](#) and [Certification](#) in public areas such as lobbies and community bulletin boards where applicants and tenants can view them, and to post these documents on the Housing Provider’s website (81 FR 80724, Preamble 80770).

1. Notice of Occupancy Rights under VAWA (24 CFR 5.2005(a)(1)(i))

Housing Providers must provide the HUD-approved Notice of Occupancy Rights under VAWA (hereinafter “VAWA Notice”) to all applicants and tenants at each of the times described above. The VAWA Notice explains the VAWA protections, including the right to [confidentiality](#), and any limitations on those protections (24 CFR 5.2005(a)(1)(i)). This Notice must be made available in multiple languages. The VAWA Notice is located in Appendix A, including translated versions in

³ For HOME-assisted Rental Housing, Housing Providers must provide the [Notice](#) and [Certification](#) when an applicant is admitted to, or denied admission to, a HOME-assisted unit based on the owner’s tenant selection policies and criteria.

several languages. Each Housing Provider must insert its name and the name of its program before distribution to applicants and tenants.

2. Certification Form (24 CFR 5.2005(a)(1)(ii))

Housing Providers must provide the HUD-approved Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (hereinafter “Certification Form”) to all applicants and tenants at each of the times described above. This Certification Form must be made available in multiple languages. The Certification Form is located in Appendix B, including translated versions in several languages.

A Survivor may choose to complete this Certification Form to document an incident of domestic violence, dating violence, sexual assault or stalking (24 CFR 5.2005(a)(1)(ii)), as further explained in the [Documentation and Verification](#) section. The Certification must:

- a) State that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking;
- b) State that the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection under these Written Standards meets the applicable definition of such incident as defined above in the [Definitions](#) section; and
- c) Include the name of the individual who committed the domestic violence, dating violence, sexual assault, or stalking, if the name is known and safe to provide.

3. [VAWA Reauthorization Act of 2013: Implementation in HUD Housing Programs Final Rule](#) (81 FR 80724)

Housing Providers must make a copy of these regulations available to applicants and tenants who ask to see them (81 FR 80724, Preamble 80769).

4. Emergency Transfer Plan (24 CFR 5.2005(e))

Housing Providers must make the [Emergency Transfer Plan](#) publicly available whenever feasible, and must make the Plan available upon request. Refer to [Emergency Transfer Plan](#) section (81 FR 80724, Preamble 80749).

b. Prohibited Basis for Denial, Termination of Assistance, or Eviction (24 CFR 5.2005(b))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC	<ul style="list-style-type: none">- Agencies- Owner/Landlord
ESG	<ul style="list-style-type: none">- Agencies- Owner/Landlord

HOME TBRA	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction

1. In General (24 CFR 5.2005(b)(1))

Housing Providers are prohibited from denying otherwise eligible applicants or terminating assistance or evicting tenants **on the basis of, or as a direct result of**, the fact that an applicant or tenant is a Survivor (24 CFR 5.2005(b)(1)). The fact that an individual is a Survivor may not be the **basis of** denying assistance, terminating assistance, or evicting tenants who are otherwise eligible. In addition, the fact that an individual has a poor rental or credit history, or a criminal record, or other adverse factors that directly result from being a Survivor may not be the basis of denying assistance, terminating assistance, or evicting tenants who are otherwise eligible (81 FR 80724, Preamble 80728).

Applicability to Emergency Shelters

Emergency Shelters are prohibited from denying admission to or removing from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a Survivor, if the individual or family otherwise qualifies for admission or occupancy (24 CFR 576.409(f)(1)).

2. Termination on the Basis of Criminal Activity (24 CFR 5.2005(b)(2))

Housing Providers may not deny tenancy or occupancy rights solely on the basis of criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking if:

- a) The criminal activity is engaged in by a member of the household of the tenant or affiliated individual⁴ (any guest⁵ or other person under control of the tenants⁶), AND

⁴ It is important to note that the inclusion of an “affiliated individual” in this provision is intended to further protect tenants by providing that a VAWA crime committed against an affiliated individual (in individual without VAWA protections) is not a basis for denying or terminating assistance to the tenant. Refer to the [Definitions](#) section for the definition of “affiliated individual” (81 FR 80724, Preamble 80735).

⁵ Under this provision, “guest” means a person temporarily staying in the unit with the consent of a tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant.

⁶ Under this provision, “other person under control of the tenants” means that the person is, or was at the time of the activity in question, on the premises because of an invitation from the tenant or other member of the household who has express or implied authority to so consent on behalf of the tenant. Absent evidence to the contrary, a person temporarily and infrequently on the premises solely for legitimate commercial purposes is not under the tenant's control.

- b) The tenant or affiliated individual is the Survivor or threatened victim of domestic violence, dating violence, sexual assault, or stalking (24 CFR 5.2005(b)(2)).

c. Construction of Lease Terms and Terms of Assistance (24 CFR 5.2005(c))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
ESG	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
HOME TBRA	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction

Housing Providers shall not construe an incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking as:

- A serious or repeated violation of a lease by the Survivor or threatened victim of such incident; or
- Good cause for terminating the assistance, tenancy, or occupancy rights of the Survivor or threatened victim of such incident (24 CFR 5.2005(c)).

d. Limitations of VAWA Protections (24 CFR 5.2005(d)(1))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
All Programs (24 CFR 5.2005(d), 24 CFR 578.99(j)(2)(i), 24 CFR 576.409(b)(2), 24 CFR 92.359(a)(2)(i))	<ul style="list-style-type: none"> - Owner/Landlord

These VAWA Written Standards shall not limit the authority of a Housing Provider, when notified of a court order, to comply with a court order with respect to:

- The rights of access or control of property, including civil protection orders issued to protect a Survivor; or
- The distribution or possession of property among members of a household (24 CFR 5.2005(d)(1)).

e. Limitations of VAWA Protections in Evicting or Terminating Assistance (24 CFR 5.2005(d)(2), (3))

These VAWA Written Standards do not prohibit Housing Providers from evicting or terminating assistance to a tenant in the following circumstances:

- 1) **For any violation not premised on⁷ an act of domestic violence, dating violence, sexual assault, or stalking** that is in question against the tenant or an affiliated individual, as long as the Housing Provider does not subject the Survivor to a more demanding standard than it applies to other tenants (24 CFR 5.2005(d)(2)).

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC 24 CFR 578.99(j)(2)(ii)	- Agencies - Owner/Landlord
ESG 24 CFR 576.409(b)(3)	- Agencies - Owner/Landlord
HOME Rental Housing Units (Acquisition, Rehabilitation, New Constructin) (24 CFR 92.359(a)(2)(ii))	- Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME (24 CFR 92.359(a)(2)(ii))	- Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction

- 2) If the Housing Provider can demonstrate that **an actual and imminent threat to other tenants or to those employed at, or providing service to the property of, the Housing Provider** would be present if that tenant or lawful occupant is not evicted or terminated from assistance (24 CFR 5.2005(d)(3)). In this context, words, gestures, actions, or other indicators will be considered an “actual or imminent threat” if they meet the standards provided in the definition of “actual or imminent threat.” See the [Definitions](#) section for the definition of “actual and imminent threat.”

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC 24 CFR 578.99(j)(2)(ii)	- Agencies - Owner/Landlord
ESG (24 CFR 576.409(b)(2))	- Owner/Landlord
HOME (24 CFR 92.359(a)(2)(i))	- Owner/Landlord

⁷ “Premised on” means that a logical nexus must exist between the alleged violation and the domestic violence. Therefore the term “not premised on” means that there is not a logical nexus between an alleged violation and domestic violence (81 FR 80724, Preamble 80786).

However, an eviction or termination of assistance should be utilized **only when there are no other actions** (i.e., as a last resort) that could be taken to reduce or eliminate the threat, including, but not limited to:

- Transferring the Survivor to a different unit,
- Barring the abuser or perpetrator from the property,
- Contacting law enforcement to increase police presence or develop other plans to keep the property safe, or
- Seeking other legal remedies to prevent the abuser or perpetrator from acting on a threat (24 CFR 5.2005(d)(4)).

f. Emergency Transfer (24 CFR 5.2005(e))

Survivors who are eligible for VAWA protections are eligible to request an emergency transfer. An emergency transfer, which means the tenant is relocated from his/her current unit to another unit that is safe, must comply with the Emergency Transfer Plan as described further in [Emergency Transfer Plan](#) section.

IV. Housing Agreements

a. Required Provisions

Tenants typically enter into agreements, known as leases or occupancy agreements, to reside in housing. However, the types of agreements required for tenants to reside in housing vary by funding source, program, and type of assistance provided. Refer to the applicable program regulation for further guidance on required agreements. These leases or occupancy agreements must include the applicable VAWA requirements. Housing Providers may either incorporate the required provisions into the lease or occupancy agreement or include the VAWA Lease Addendum, which includes the required provisions applicable to the Program, in the lease or occupancy agreement. Snohomish County has developed the following VAWA Lease Addendums based on the HUD model Lease Addendum with revisions as necessary to incorporate program-specific requirements:

- VAWA Lease Addendum CoC Program
- VAWA Lease Addendum ESG Program
- VAWA Lease Addendum HOME Program - Rental Housing Units
- VAWA Lease Addendum HOME Program - TBRA

Housing Providers are encouraged to include these VAWA Lease Addendums in the lease or occupancy agreement to ensure the inclusion of all required provisions. If a Housing Provider chooses not to use these VAWA Lease Addendums, it must submit proposed VAWA provisions for the lease or occupancy agreement or a proposed alternate VAWA Lease Addendum to the County for review and approval prior to use to ensure that all the necessary requirements are included.

1. Agency Leases Non-Agency-Owned Housing from Owner/Landlord

This section applies to the following program(s) and type(s) of funding:

Program	Type of Funding
CoC	Leasing and/or operating costs

i. Agency Master Lease with Owner/Landlord (24 CFR 578.99(j)(5)(i)(A))

Any agreements between Agencies and Owners/Landlords of housing must include:

- The requirement to comply with 24 CFR part 5, subpart L.

ii. Tenant Sublease/Occupancy Agreement with Agency (24 CFR 578.99(j)(5)(ii))

Any agreements between tenants and Agencies must include, as an incorporated provision or via the VAWA Lease Addendum for the CoC Program referenced above.

- All requirements that apply to tenants, the Owner, or the lease under 24 CFR part 5, subpart L;
- Prohibited bases for eviction; and
- Restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).

The provision or Addendum may specify that these protections, as described above, apply only during the period of applicability (24 CFR 578.99(j)(5)(ii)). Refer to the [Period of Applicability](#) section.

Any agreements between Agencies and tenants must permit the tenant to terminate the agreement (lease, sublease, or occupancy agreement) without penalty if the Agency determines that the tenant qualifies for an emergency transfer under the [Emergency Transfer Plan](#) (24 CFR 578.99(j)(5)(iii)).

2. Tenant Leases Non-Agency-Owned Housing from Owner/Landlord

This section applies to the following program(s) and type(s) of funding:

Program	Type of Funding
CoC	Rental Assistance to non-Agency-owned housing
ESG	Rental Assistance to non-Agency-owned housing
HOME	Tenant-Based Rental Assistance (TBRA) to non-Agency-owned housing

i. Tenant Lease with Owner/Landlord
(24 CFR 578.99(j)(5)(i)(B), 24 CFR 576.106(g))

Any agreements between tenants and Owners/Landlords of housing must include, as an incorporated provision or via the VAWA Lease Addendum for the CoC Program, the ESG Program, or the HOME Program - TBRA referenced above:

- All requirements that apply to tenants, the Owner, or the lease under 24 CFR part 5, subpart L;
- Prohibited bases for eviction; and
- Restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).

The provision or Addendum may specify that these protections, as described above, apply only during the period of applicability (24 CFR 578.99(j)(5)(iv)), 24 CFR 92.359(e). Refer to the [Period of Applicability](#) section.

In addition to the requirements above, the following additional requirements apply:

Type of Funding	Additional Program-Specific Requirements
HOME TBRA	Any agreements between tenants and Owners/Landlords must: (1) permit the tenant to terminate the agreement (lease, sublease, or occupancy agreement) without penalty if Snohomish County as the Participating Jurisdiction, or Agency designated to administer the TBRA program on behalf of Snohomish County, determines that the tenant qualifies for an emergency transfer under the Emergency Transfer Plan 24 CFR 92.359(e)), and (2) include the requirement that the Owner must notify Snohomish County as the Participating Jurisdiction, or Agency designated to administer the TBRA program on behalf of Snohomish County, before the Owner bifurcates the lease or provides notification of eviction to the tenant (24 CFR 92.359(e)).

ii. Agency Agreement with Owner/Landlord
(24 CFR 578.99(j)(5)(i)(A), 24 CFR 578.99(j)(5)(iv), 24 CFR 576.106(e))

An agreement (e.g., Rental Assistance Agreement or Letter of Agreement) between the Agency and the Owner/Landlord is generally required for an Agency to provide rental assistance to the Owner/Landlord to assist the tenant in housing; these agreements typically include the terms under which rental assistance will be provided, the term of the agreement, and that the landlord/owner will provide the Agency with a copy of all written notices to the tenant.

Any agreements between Agencies and Owners/Landlords of housing must also include:

- The requirement to notify the Agency when the Owner/Landlord intends to [bifurcate the lease](#) or evict a tenant (24 CFR 92.359(e));
- The requirement to comply with 24 CFR part 5, subpart L;
- The requirement to include a lease provision or Addendum in the agreement between the tenant and owner/landlord that includes:
 - All requirements that apply to tenants, the owner, or the lease under 24 CFR part 5, subpart L;
 - Prohibited bases for eviction; and
 - Restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).

3. Tenant Leases Agency-Owned Housing

This section applies to the following program(s) and type(s) of funding:

Program	Type of Funding
CoC	<ul style="list-style-type: none">- Acquisition, rehabilitation, new construction, operating costs- Rental Assistance to Agency-owned housing
ESG	<ul style="list-style-type: none">- Rental Assistance to Agency-owned housing
HOME	<ul style="list-style-type: none">- Rental Housing Units assisted with HOME funds- Tenant-Based Rental Assistance to Agency-owned housing

Any agreements between Agencies/Owners and tenants must include, as an incorporated provision or via the VAWA Lease Addendum for the CoC Program, the ESG Program, the HOME Program – Rental Housing Units, or the HOME Program - TBRA:

- All requirements that apply to tenants, the owner, or the lease under 24 CFR part 5, subpart L;
- Prohibited bases for eviction; and
- Restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).

The provision or Addendum may specify that these protections, as described above, apply only during the period of applicability (24 CFR 578.99(j)(5)(ii)). Refer to the [Period of Applicability](#) section.

In addition to the requirements above, the following additional requirements apply:

Type of Funding	Additional Program-Specific Requirements
CoC acquisition, rehabilitation, new construction, operating costs	Any agreements between Agencies/Owners and tenants must permit the tenant to terminate the agreement (lease, sublease, or occupancy agreement) without penalty if the Agency/Owner determines that the tenant qualifies for an emergency transfer under the Emergency Transfer Plan (24 CFR 578.99(j)(5)(iii), 24 CFR 92.359(e)).
HOME Rental Housing (acquisition, rehabilitation, new construction)	
HOME TBRA	

V. Remedies Available to Survivors (24 CFR 5.2009)

a. Lease Bifurcation (24 CFR 5.2009(a))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
All Programs	Owner/Landlord

Housing Providers may, but are not required to, bifurcate a lease, or remove a household member from a lease to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking against an affiliated individual or other individual:

- 1) Without regard to whether the household member is a signatory to the lease; and
- 2) Without evicting, removing, terminating assistance to, or otherwise penalizing a Survivor of such criminal activity who is also a tenant or lawful occupant (24 CFR 5.2009(a)(1)).

Lease bifurcation must be carried out in accordance with applicable Federal, State, or local laws (24 CFR 5.2009(a)(2)).

b. Lease Bifurcation – Time to Establish Eligibility (24 CFR 5.2009(b))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC	- Agencies
ESG	- Agencies
HOME TBRA	- Agency administering TBRA program on behalf of Snohomish County
HOME Rental Housing (Acquisition, Rehabilitation, New Construction)	- Owner/Landlord

If a Housing Provider exercises the option to bifurcate a lease, the remaining tenant(s) (i.e. Survivors) are eligible to continue receiving assistance under the applicable Program as specified below. The Housing Provider shall:

Type of Funding/Intervention	Bifurcation Requirements – Remaining Tenant
CoC Rapid Rehousing (TBRA) and ESG Rapid Rehousing (TBRA)	Continue providing rental assistance to the remaining tenant(s) (24 CFR 578.99(j)(7)(i), 24 CFR 576.409(e)(1)).
CoC Permanent Supportive Housing	If the remaining tenant is the qualifying tenant, continue providing rental assistance to the remaining tenant. If the individual who was evicted or for whom assistance was terminated was the eligible/qualifying tenant, continue providing assistance to the remaining tenant(s) until the expiration of the lease in effect at the time of the eligible/qualifying member's eviction (24 CFR 578.75(j), 24 CFR 578.99(j)(7)(ii)).
HOME Rental Housing (Acquisition, Rehabilitation, New Construction)	The remaining tenant(s) may remain in the HOME-assisted unit (24 CFR 92.359(d)(1)).
HOME TBRA	The remaining tenant(s) will retain the HOME TBRA (24 CFR 92.359(d)(2)).

c. Promoting Housing Stability (24 CFR 5.2009(c))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
ESG	<ul style="list-style-type: none"> - Agencies - Owner/Landlord
HOME TBRA	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction

Housing Providers are encouraged to undertake whatever actions are permissible and feasible to assist Survivors residing in their units to remain in their units or other units under the program or other housing providers, and for the Housing Provider to bear the costs of any [transfer](#), where permissible (24 CFR 5.2009(c)).

VI. Documentation and Verification (24 CFR 5.2007(a), (b))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC (24 CFR 578.99(j)(2)(iii))	<ul style="list-style-type: none"> - Agencies - Owner/Landlord, except in specific circumstances*
ESG Rental Assistance (24 CFR 576.409(b)(4))	<ul style="list-style-type: none"> - Agencies - Owner/Landlord, except in specific circumstances*
HOME TBRA 24 CFR 92.359(a)(2)(ii)	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction) 24 CFR 92.359(a)(2)(ii)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction
<p>* Limiting documentation requests by Owners/Landlords: Agencies may limit documentation requests to only Agencies (to the exclusion of Owners/Landlords), provided that:</p> <ol style="list-style-type: none"> This limitation is made clear in the Notice and rental assistance agreement; The entity designated to receive documentation requests determines whether the tenant is entitled to protection under VAWA and immediately advise the tenant of the determination; and If the tenant is entitled to protection, the entity designated to receive documentation requests must notify the Owner/Landlord in writing that the tenant is entitled to protection under VAWA and work with the Owner/Landlord on the tenant's behalf. Any further sharing or disclosure of the tenant's information will be subject to Confidentiality requirements (24 CFR 578.99(j)(2)(iii), 24 CFR 576.409(b)(4)). 	

Housing Providers are *not* required to request that an individual submit documentation of his/her status as a Survivor in order to provide VAWA [Protections](#) or [Remedies](#) (24 CFR 5.2007(b)(3)).

If an applicant or tenant represents that he/she is a Survivor entitled to VAWA [Protections](#) or [Remedies](#), the Housing Provider *may* request, in writing, that the applicant or tenant submit to the Housing Provider the following documentation of his/her status as Survivor (24 CFR 5.2007(a)(1)). If the Housing Provider chooses this option, the applicant or tenant has **14 business days** from the date they receive the written

request to submit the requested documentation; it is recommended that Housing Providers include this deadline in the written request (24 CFR 5.2007(a)(2)). In addition, the Housing Provider may, at its discretion, extend the **14-business day** deadline; it is recommended that any deadline extension be provided to the applicant or tenant in writing.

The applicant or tenant may submit any one (1) of the following forms of documentation – **the applicant or tenant may choose which of the following forms of documentation to submit:**

1. The [Certification Form](#); or
2. **Third-Party Documentation:**
 - a) A document:
 - i. Signed by a Professional⁸ from whom the Survivor has sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse;
 - ii. Signed by the applicant or tenant; and
 - iii. That specifies, under penalty of perjury, that the Professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for Protection and Remedies, and that the incident meets the [Definition](#) of domestic violence, dating violence, sexual assault, or stalking; or
 - b) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
 - c) At the discretion of a Housing Provider, a statement or other evidence provided by the applicant or tenant.

Housing Providers must accept signed [Certification](#) Forms from Survivors documenting incidents of domestic violence, dating violence, sexual assault, or stalking without evaluating the truthfulness of the allegations. If the Housing Provider receives documentation listed above that contains conflicting information,⁹ the Housing Provider *may* require an applicant or tenant to submit Third-Party Documentation within **30-calendar days** of the date of the request for Third-Party Documentation 24 CFR 5.2007(b)(2). *However*, Housing Providers *may not* require Third-Party Documentation in any situation except for those involving conflicting evidence (81 FR 80724, Preamble 80762-4).

⁸ A Professional includes an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional.

⁹ Documentation with conflicting information includes Certification Forms from two (2) or more members of a household each claiming to be a Survivor and naming one (1) or more of the other petitioning household members as the abuser or perpetrator.

VII. Emergency Transfer Plan (24 CFR 5.2005(e))

This provision applies to the Housing Provider(s) specified below:

Type of Funding	Responsible Housing Provider
CoC	- Agencies
ESG	- Agencies
HOME TBRA	<ul style="list-style-type: none"> - Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction <p>Snohomish County or the Agency administering HOME TBRA on behalf of Snohomish County, must make the determination of whether a tenant qualifies under this Emergency Transfer Plan (24 CFR 92.359(g), 81 FR 80759).</p>
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	<ul style="list-style-type: none"> - Owner/Landlord - Snohomish County, as the Participating Jurisdiction <p>Snohomish County, as the Participating Jurisdiction, must make the determination of whether a tenant qualifies under this Emergency Transfer Plan. (24 CFR 92.359(g), 81 FR 80759).</p>

This Emergency Transfer Plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that these programs are in compliance with VAWA. Housing Providers must make this Emergency Transfer Plan publicly available whenever feasible, and must make the Plan available upon request (81 FR 80724, Preamble 80749).

An emergency transfer means the tenant is relocated from his/her current unit to another unit that is safe in accordance with this Emergency Transfer Plan. **A safe unit** is a unit that the Survivor believes is safe (24 CFR 5.2005(e)(1)(iii)). An emergency transfer may be:

- **Internal:** an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant (i.e., the tenant may reside in the new unit without having to undergo an application process) (24 CFR 5.2005(e)(1)(i)).
- **External:** an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant (i.e., the tenant must undergo an application process in order to reside in the new unit and be determined to be eligible for that unit) (24 CFR 5.2005(e)(1)(ii)).

Tenants may request an internal and external emergency transfer concurrently if a safe unit is not immediately available so that the tenant has a greater opportunity to move to a safe unit as quickly as possible (81 FR 80724, Preamble 80751, 24 CFR 5.2005(e)(8)).

a. Eligibility for Emergency Transfers

A tenant who is a Survivor is eligible for an emergency transfer if the tenant:

1. Expressly requests the transfer; and
2. Either:
 - Reasonably believes that there is a threat of **imminent** harm from further violence if the tenant remains in the same unit; or
 - Was a victim of [sexual assault](#)* that occurred on the premises within the **90-calendar-day** period preceding the request for an emergency transfer (24 CFR 5.2005(e)).

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements established above (81 FR 80724, Preamble 80749).

Imminent Harm or Sexual Assault within 90-Calendar Days

It is important to note that Survivors may have experienced more than one occurrence of domestic violence, dating violence, sexual assault, or stalking. For the purposes of eligibility for emergency transfers, it does not matter when an initial act occurred (i.e., an initial act could have occurred 10 years ago), as long as the current belief of a threat of imminent harm is reasonable, or, in cases of sexual assault*, the assault occurred on the premises during the **90-calendar-day** period preceding the transfer request (81 FR 80724, Preamble 80743).

A **reasonable belief** that the tenant is threatened with imminent harm from further violence means that the tenant has a reason to fear that, without a transfer, the tenant would suffer violence in the very near future (81 FR 80724, Preamble 80745).

*Victims of [sexual assault](#) are eligible for an emergency transfer if they **either**:

- a. Reasonably believe there is a threat of imminent harm from further violence if they remain in their unit, regardless of where or when the sexual assault occurred, or
- b. The sexual assault occurred on the premises during the **90-calendar-day** period preceding the date of the request for transfer, regardless of whether they reasonably believe there is a threat of imminent harm from further violence if they remain in the unit (81 FR 80724, Preamble 80753).

b. Emergency Transfer Documentation

1. Emergency Transfer Requests

To request an emergency transfer, the tenant shall notify the Housing Provider and make a request for a transfer. Housing Providers must provide reasonable accommodations to this policy

for individuals with disabilities. The request for a transfer may be made verbally or in writing and must include the following information in order to document eligibility for the transfer:

- A statement by the tenant certifying that the tenant reasonably believes that there is a threat of **imminent** harm from further violence if the tenant were to remain in the same unit; *or*
- For victims of sexual assault, a statement by the tenant certifying that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the **90-calendar-day** period preceding the tenant's request for an emergency transfer.

Housing Providers may, but are not required to:	Request that an individual seeking an emergency transfer document his/her status as a Survivor in accordance with the Documentation requirements if the individual has not already provided this documentation (24 CFR 5.2005(e)(2)(ii)).
	Request that an individual submit written documentation of his/her emergency transfer request certifying that he/she meets the requirements above (24 CFR 5.2007(e)(10)(i)). However, Housing Providers are encouraged not to require written requests in exigent circumstances where an individual's health or safety is at risk (81 FR 80724, Preamble 80749).
Housing Providers may not :	Require additional documentation, such as third-party documentation, to determine whether a tenant seeking an emergency transfer is eligible for an emergency transfer (24 CFR 5.2005(e)(10)(iii); 81 FR 80724, Preamble 80741).

Housing Providers must document verbal requests received in order to demonstrate that the tenant meets the eligibility requirements for the transfer that are listed above.

Housing Providers that choose to request written documentation of a transfer request may consider using the HUD model emergency transfer request, HUD Form 5383 Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking.

2. Records of Emergency Transfers

Housing Providers must keep a record of all emergency transfers requested, whether received verbally or in writing, and the outcome of such requests, and retain these records for a period of three (3) years, or for the period of time specified in the program regulations. Requests and outcomes of such requests must be reported to Snohomish County annually (24 CFR 5.2005(e)(12)).

c. Confidentiality

The Housing Provider must follow all the applicable confidentiality requirements described in the [Confidentiality](#) section. This includes, but is not limited to, not disclosing the location of the new dwelling unit to which the Survivor is transferred to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant (24 CFR 5.2005(e)(4)).

d. Emergency Transfer Timing and Availability

Housing Providers must act as quickly as possible to process the emergency transfer request and to move the Survivor to another unit, subject to the safety and availability of a unit, and in accordance with the Emergency Transfer Prioritization described below (81 FR 80724, Preamble 80745, 80750). However, Housing Providers cannot guarantee that an emergency transfer request will be approved or how long it will take to process a request.

If a Survivor reasonably believes that a proposed transfer would not be safe, the Survivor may request a transfer to a different unit. If a unit is available, the transferred Survivor must agree to abide by the terms and conditions that govern occupancy in the unit to which the Survivor has been transferred. A Housing Provider may be unable to transfer a Survivor to a particular unit if the Survivor has not or cannot establish eligibility for that unit.

e. Emergency Transfer Prioritization

1. Homeless Housing Providers

This section applies to the following program(s) and type(s) of assistance:

Program	Type of Assistance/Intervention
CoC	Transitional Housing, Rapid Rehousing, Permanent Supportive Housing
ESG	Rapid Rehousing
HOME TBRA	Tenant-Based Rental Assistance for individuals and/or families who were experiencing literal homelessness at the time of program intake.
HOME Rental Housing Units (acquisition rehabilitation, new construction)	Rental Housing that is contractually required to fill vacancies through the Investing in Futures (IIF) Coordinated Entry (CE) System

Housing Providers that provide the homeless housing assistance described above must coordinate with the [Investing in Futures \(IIF\) Coordinated Entry \(CE\) System](#) for all VAWA emergency transfers. Emergency transfers to the next available housing opening/vacancy are made regardless of whether the unit is of the same intervention type as long as the tenant meets the eligibility requirements. However, it is the tenant's choice whether to accept the unit.

a. Internal transfers:

- i. The Housing Provider must allow tenants to make an internal emergency transfer when a safe unit is immediately available (24 CFR 5.2005(e)(5)).
- ii. The Housing Provider must inform the IIF CE Housing Referral Coordinator of the transfer by providing information on the unit from which and to which the tenant is transferring. This coordination is essential, particularly where a safe unit is not immediately available and the tenant requests both an internal and external transfer concurrently.

b. External transfers:

- i. If the Housing Provider has no safe and available units for which the tenant is eligible and may be transferred to, the Housing Provider must inform the IIF CE Housing Referral Coordinator of the external transfer request so that the IIF CE Housing Referral Coordinator can refer the tenant to the next available unit through the CE system.
- ii. Through CE, tenants who qualify for an emergency transfer are prioritized for the next available homeless housing opening/vacancy for which they qualify, as long as the tenant believes the unit to be safe.

2. Other Housing Providers

This section applies to the following program(s) and type(s) of assistance:

Program	Type of Assistance/Intervention
HOME TBRA	Tenant-Based Rental Assistance (TBRA) for individuals and/or families who were not experiencing literal homelessness at the time of program intake
HOME Rental Housing Units (acquisition, rehabilitation, new construction)	Rental Housing Units that are not contractually required to fill vacancies through the Investing in Futures (IIF) Coordinated Entry (CE) System.

Housing Providers that provide the housing assistance described above must follow this Plan for all VAWA emergency transfers.

a. Internal transfers:

- i. The Housing Provider must allow internal emergency transfers when a safe unit is immediately available (24 CFR 5.2005(e)(5)).
- ii. When a safe unit is not immediately available, the Housing Provider must assist the tenant in making an internal emergency transfer as expeditiously as possible and must make reasonable efforts to assist the tenant as outlined in the “external transfer” section below. The Housing Provider must give the tenant requesting an internal emergency transfer under VAWA , at a minimum, any applicable priority that Housing Provider provides to other types of emergency transfer requests (in relation to other categories of

tenants seeking transfers and individuals seeking placements on waiting lists) (24 CFR 5.2005(e)(6)). Housing Providers are encouraged to consider giving priority to VAWA emergency transfers and to consider the potential danger to a Survivor until the transfer can be made. In instances where there are multiple tenants who need and qualify for a vacant unit, Housing Providers are encouraged to transfer applicants who qualify for an emergency transfer under VAWA as quickly as possible and to prioritize between tenants that need a transfer. (81 FR 80724, Preamble 80750).

b. External transfers:

- i. If the Housing Provider has no safe and available units for which the tenant is eligible and may be transferred to, the Housing Provider must make reasonable efforts to assist the tenant in identifying other Housing Providers (private, non-profit, or government) that may have safe and available units for which the tenant is eligible and to which the tenant could transfer to through an external emergency transfer. Reasonable efforts may include:

1. Arrangements, including memoranda of understanding, with other covered Housing Providers to facilitate moves; and
2. Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking (24 CFR 5.2005(e)(7)).

Housing Providers are encouraged, but not required, to have arrangements referenced above with other covered Housing Providers and to accept emergency transfers from these Housing Providers, as long as the Program eligibility requirements are met. (81 FR 80724, Preamble 80750).

- ii. Housing Providers must provide the tenant with the HOME-Assisted Units List supplied by the Snohomish County Human Services Department. The list will include properties in Snohomish County with HOME-assisted rental units with the following information on each property: the property's address, contact information, unit sizes (number of bedrooms), and to the extent known, any tenant preferences or eligibility restrictions for the HOME-assisted units (24 CFR 92.359(g)(2)).

f. Safety and Security of Tenants

Snohomish County and Housing Providers cannot guarantee the safety or security of individuals and families who choose to request a transfer and/or who are transferred under this plan. Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe. In addition, at the tenant's request, Housing Providers will assist tenants in contacting Domestic Violence Services of Snohomish County, the local organization offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

For help for victims of domestic violence, dating violence, sexual assault, or stalking, call:

Domestic Violence Services of Snohomish County

24-hour crisis hotline: 425-25-ABUSE (425-252-2873)

A transfer is only required where there is a safe and available unit to transfer the tenant to (81 FR 80724, Preamble 80741). If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit (81 FR 80724, Preamble 80749).

g. Emergency Transfer Costs

Moving costs may be prohibitive for some Survivors. Agencies and Owners as Housing Providers are encouraged to bear the costs of emergency transfers, where possible, and to work with victims, local victim service providers, and other community partners to identify other sources of possible funding to help with costs related to transfers (81 FR 80724, Preamble 80784). Such costs may include, for example, administrative and unit turnover costs that are typically paid by owners and management agents as part of administering assisted housing. However, Housing Providers are not required to bear moving costs that tenants and their household members generally pay, including application fees, deposits, and costs to physically move the household and their belongings. (81 FR 80724, Preamble 80743-44).

Housing Providers should follow guidance related to eligible costs that may assist with the emergency transfer that may be paid under the applicable Program. Depending on the Program, this may, for example, include costs such as security deposits, first month's rent, damages, and/or other moving costs. In addition, the following Programs specifically address costs associated with emergency transfers:

Type of Funding	Program-Specific Provisions
CoC acquisition, rehabilitation, new construction, leasing, operating costs	Any agreements between tenants and Owners/Landlords must permit the tenant to terminate the agreement without penalty if the tenant meets the conditions for an emergency transfer. Refer to the Housing Agreements section.
HOME Rental Housing	
HOME TBRA	
CoC TBRA	CoC TBRA funds may be used to pay amounts owed to Owners/Landlords for breaking the lease if the tenant qualifies for an emergency transfer (24 CFR 578.51(m)).
ESG TBRA	ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under 576.106 (24 CFR 576.105(a)(7)).

IX. Assistance to Non-Survivors

If a Housing Provider exercises the option to bifurcate a lease, or if a family separates due to an emergency transfer, the individual who was removed from the lease or who is the non-transferring family member (i.e. the abuser/perpetrator or alleged abuser/perpetrator) may still receive assistance under the applicable Program if the following requirements are met:

Type of Funding/Intervention	Removed Tenant or Non-Transferring Family Member Eligibility
CoC Rapid Rehousing (TBRA) and ESG Rapid Rehousing (TBRA) (24 CFR 578.99(j)(8)(i) and 24 CFR 576.409(d)(3)(ii))	The tenant may request to continue to receive assistance under the Agency's CoC TBRA or ESG TBRA project. If such a request is made and the individual meets all of the Program eligibility requirements, the Agency may continue providing assistance.
CoC Permanent Supportive Housing (24 CFR 578.99(j)(8)(i))	The tenant may request to continue to receive assistance under the Agency's CoC Permanent Supportive Housing project. If such a request is made and the individual meets all of the Program eligibility requirements, the Agency may continue providing assistance.
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	The tenant may request to continue to receive assistance under the Agency's HOME Rental Housing Unit project. If such a request is made and the individual meets all of the Program eligibility requirements and the Owner's tenant selection policies and criteria, the Agency may continue providing assistance.
HOME TBRA 24 CFR 92.359(d)(2)	The tenant remains eligible and may request to continue to receive assistance under the HOME TBRA program for another housing unit. If such a request is made, the Agency may continue providing assistance (24 CFR 92.359(d)(2)).

Housing providers that seek to terminate assistance to the individual removed from the lease or the individual who is the non-transferring family member must ensure they are following existing program regulations and policies, including lease policies, which allow for such termination, as well as any applicable state and local laws. (81 FR 80724, Preamble 80760).

Appendix A

[Insert Name of Housing Provider¹⁰]

Notice of Occupancy Rights under the Violence Against Women Act¹¹

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.¹² The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that **[insert name of program or rental assistance]** is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under **[insert name of program or rental assistance]**, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

¹⁰ The notice uses HP for housing provider but the housing provider should insert its name where HP is used. HUD’s program-specific regulations identify the individual or entity responsible for providing the notice of occupancy rights.

¹¹ Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

¹² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Protections for Tenants

If you are receiving assistance under **[insert name of program or rental assistance]**, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under **[insert name of program or rental assistance]** solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

Removing the Abuser or Perpetrator from the Household

HP may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If HP chooses to remove the abuser or perpetrator, HP may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, HP must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to

establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, HP must follow Federal, State, and local eviction procedures. In order to divide a lease, HP may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, HP may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, HP may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.

(2) You expressly request the emergency transfer. Your housing provider may choose to require that you submit a form, or may accept another written or oral request.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

HP will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

HP's emergency transfer plan provides further information on emergency transfers, and HP must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

HP can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from HP must be

in writing, and HP must give you at least 14 business days (Saturdays, Sundays, and Federal holidays do not count) from the day you receive the request to provide the documentation. HP may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to HP as documentation. It is your choice which of the following to submit if HP asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by HP with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, “professional”) from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or

incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.

- Any other statement or evidence that HP has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, HP does not have to provide you with the protections contained in this notice.

If HP receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), HP has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, HP does not have to provide you with the protections contained in this notice.

Confidentiality

HP must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

HP must not allow any individual administering assistance or other services on behalf of HP (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

HP must not enter your information into any shared database or disclose your information to any other entity or individual. HP, however, may disclose the information provided if:

- You give written permission to HP to release the information on a time limited basis.
- HP needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires HP or your landlord to release the information.

VAWA does not limit HP's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, HP cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if HP can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

- 1) Would occur within an immediate time frame, and
- 2) Could result in death or serious bodily harm to other tenants or those who work on the property.

If HP can demonstrate the above, HP should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any Federal, State, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint with **[insert contact information for any intermediary, if applicable]** or **[insert HUD field office]**.

For Additional Information

You may view a copy of HUD's final VAWA rule at **[insert Federal Register link]**.

Additionally, HP must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact **[insert name of program or rental assistance contact information able to answer questions on VAWA]**.

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact **[Insert contact information for relevant local organizations]**.

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact **[Insert contact information for relevant organizations]**

Victims of stalking seeking help may contact **[Insert contact information for relevant organizations]**.

Attachment: Certification form HUD-

Appendix B

CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, AND ALTERNATE DOCUMENTATION

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose

this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Appendix C

EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice: _____

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

ORDERS OF PRIORITY FOR HOMELESS HOUSING BEDS

These Orders of Priority for Homeless Housing Beds include two (2) parts:

- A. **Order of Priority for All Homeless Housing Beds, and**
- B. **Order of Priority for Homeless Housing Beds Where There are No Persons Experiencing Chronic Homelessness within the Everett/Snohomish County CoC.**

The Everett/Snohomish County Continuum of Care (CoC) follows these Orders of Priority in filling homeless housing beds through the Coordinated Entry (CE) system. These Orders of Priority have been adopted by the Partnership to End Homelessness (PEH) CoC Board to ensure that the most vulnerable individuals and families are prioritized for limited homeless housing resources. These Orders of Priority are used to fill the following types of homeless housing beds:

- **Transitional Housing (TH)**
- **Permanent Supportive Housing (PSH)**¹
- **Rapid Rehousing (RRH)**
- **Other Permanent Housing (OPH)**

Prioritization is based on specific and definable criteria collected via the standardized Investing in Futures (IIF) Housing Assessment; prioritization decisions are based on the following vulnerability factors and assessment information:

- **Length of time homeless, and**
- **Severity of service needs.**²

Prioritization criteria are separate and distinct from eligibility criteria for homeless housing programs. It is ultimately the Homeless Housing Provider's responsibility to determine and document individuals' and families' eligibility for homeless housing programs.

¹Permanent Supportive Housing (PSH) includes *Chronically Homeless Dedicated* and *DedicatedPLUS* housing beds.

² Severe service needs are *not* based on a specific diagnosis or disability type, but only on the severity of needs of the individual or family, considering: history of high utilization of crisis services (e.g., emergency rooms, jails, and psychiatric facilities); significant health or behavioral health challenges, substance use disorders, or functional impairments that require a significant level of support to maintain permanent housing; and, the presence of a child under the age of two (2) or two (2) or more children under the age of five (5) who are currently living in a place not meant for human habitation, and the presence of a pregnant woman in the household.

A. Order of Priority for All Homeless Housing Beds

The CoC adopts the following order of priority for all of the CoC's homeless housing beds. **Veterans are the highest priority within each of the categories below.**

1st Priority:

Chronically Homeless³ Individuals and Families with the Longest Histories of Homelessness and the Most Severe Service Needs

A chronically homeless individual or head of household for whom both of the following are true:

- i. The chronically homeless individual or head of household has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter⁴ for at least 12 months⁵ either continuously or on at least four (4) separate occasions in the last three (3) years, where the cumulative total length of the four (4) occasions equals at least 12 months;

AND

- ii. The CoC has identified the chronically homeless individual or head of household as having severe service needs.

2nd Priority:

Chronically Homeless Individuals and Families with the Longest Histories of Homelessness

A chronically homeless individual or head of household for whom the following is true:

- i. The chronically homeless individual or head of household has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four (4) separate occasions in the last three (3) years, where the cumulative total length of the four (4) occasions equals at least 12 months.

Where the CoC is not able to identify chronically homeless individuals and families within the CoC, the **Order of Priority for Homeless Housing Beds Where There Are No Persons Experiencing Chronic Homelessness within the Everett/Snohomish County CoC** will be followed.

³ The definition of chronically homeless requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in a safe haven, or in an emergency shelter for at least 12 months either continuously or cumulatively over a period of at least four (4) occasions in the last three (3) years. For the definition of chronic homelessness, refer to the U.S. Department of Housing and Urban Development's [Defining "Chronically Homeless" Rule \(80 FR 75791\)](#).

⁴ In all instances where a place not meant for human habitation, safe haven, and emergency shelter are referenced, this also includes an individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of chronic homelessness or literal homelessness, as applicable, before entering the facility.

⁵ Priority is based on the length of time (e.g., number of months) the individual or head of household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter.

B. Order of Priority for Homeless Housing Beds Where There Are No Persons Experiencing Chronic Homelessness within the Everett/Snohomish County CoC

The CoC adopts the following order of priority for all of the CoC's homeless housing beds when the CoC has determined that there are no chronically homeless individuals or families within the Everett/Snohomish County CoC. **Veterans are the highest priority within each of the categories below.**

1st Priority:

Homeless Individuals and Families with the Longest Histories of Episodic Homelessness and the Most Severe Service Needs

A homeless individual or a family for whom both of the following are true:

- i. The homeless individual or head of household has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter on *less than* four (4) occasions in the last three (3) years, where the cumulative total length of occasions equals *at least* 12 months;

AND

- ii. The CoC has identified the homeless individual or head of household as having severe service needs.

2nd Priority:

Homeless Individuals and Families with the Longest Histories of Homelessness and the Most Severe Service Needs

A homeless individual or a family for whom both of the following are true:

- i. The homeless individual or head of household has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter;

AND

- ii. The CoC has identified the homeless individual or head of household as having severe service needs.

3rd Priority:

Homeless Individuals and Families with the Longest Histories of Homelessness

A homeless individual or a family for whom the following is true:

- i. The homeless individual or head of household has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter.

4th Priority:

Homeless Individuals and Families Coming from Transitional Housing

A homeless individual or a family for whom one (1) of the following is true:

- i. The homeless individual or head of household has been homeless and living in a transitional housing, where prior to residing in the transitional housing, had lived in a place not meant for human habitation, a safe haven, or in emergency shelter;

OR

- ii. The homeless individual or head of household has been homeless and living in transitional housing and who was fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking prior to residing in the transitional housing; there is no requirement that the homeless individual or head of household lived in a place not meant for human habitation, a safe haven, or in an emergency shelter prior to entering the transitional housing.

C. Orders of Priority for an Emergency Transfer Consistent with the VAWA Written Standards

The CoC adopts the following order of priority for all of the CoC's homeless housing beds when a homeless housing participant requests and qualifies for an emergency transfer consistent with the VAWA Written Standards (Appendix C of the Written Standards). The eligible participant will be granted an emergency transfer to the next available housing opening/vacancy regardless of whether the unit is of the same intervention type as long as the tenant meets the eligibility requirements. However, it is the tenant's choice whether to accept the unit.

<p>1. Internal transfers:</p> <ul style="list-style-type: none">a. The Housing Provider must allow tenants to make an internal emergency transfer when a safe unit is immediately available (24 CFR 5.2005(e)(5)).b. The Housing Provider must inform the CE Housing Referral Coordinator of the transfer by providing information on the unit from which and to which the tenant is transferring. This coordination is essential, particularly where a safe unit is not immediately available and the tenant requests both an internal and external transfer concurrently.
<p>2. External transfers:</p> <ul style="list-style-type: none">a. If the Housing Provider has no safe and available units for which the tenant is eligible and may be transferred to, the Housing Provider must inform the Housing Referral Coordinator of the external transfer request so that the CE Housing Referral Coordinator can refer the tenant to the next available unit through the CE system.b. Through CE, tenants who qualify for an emergency transfer are prioritized for the next available homeless housing opening/vacancy for which they qualify, as long as the tenant believes the unit to be safe.



Snohomish County, WA

Human Services

Office of Community and Homeless Services

Rent Reasonableness Policies and Procedures

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I. Determining and Documenting Rent Reasonableness

Determining and documenting rent reasonableness is required for projects that provide assistance to scattered-site housing units to ensure that rents being paid are reasonable in relation to rents being charged for comparable unassisted units in the same market. Under the Continuum of Care (CoC) and Emergency Solutions Grants (ESG) Programs, rent reasonableness determinations must be made for all housing units assisted with leasing or rental assistance funds.

Rent reasonableness must be documented prior to executing the lease for an assisted unit and at least annually thereafter. Recipients must document the proposed unit's rent reasonableness using the Rent Reasonableness Certification form; this completed form along with back-up documentation must be maintained in each participant file to demonstrate that the proposed unit is rent reasonable.

a. Methodology

To demonstrate that the assisted unit is rent reasonable, recipients must compare the proposed unit's rent to the rent of at least **three (3)** comparable unassisted units in the area *and* must also compare the proposed unit's rent to rents currently being charged by the same owner for comparable unassisted units. Methodologies for demonstrating rent reasonableness include:

1. Obtaining data on three (3) comparable unassisted units in the area by:
 - a. Locating and completing an analysis of three (3) comparable units in the market area on a unit-by-unit basis by using other data sources (refer to the [Completing a Rent Reasonable Analysis](#) section below for further guidance). In order to ensure a reasonable market sample, the units for the analysis must each be located in a different building/complex in the market area and also be located in a different building/complex than the proposed unit.

AND

2. Obtaining data on rents charged by the same owner for comparable unassisted units by:
 - a. Obtaining documentation from the property owner/manager on rents charged for comparable unassisted units managed by the same property owner/manager (refer to the [Owner's Rent Charged for Comparable Unassisted Units](#) section below for further guidance).

b. Documentation Requirements

The following documentation is required to determine rent reasonableness and must be maintained in the participant file:

- Completed Rent Reasonableness Certification form; and
- Backup documentation (e.g., copies of advertisements of units for rent, etc.) for the comparable units included in the Rent Reasonableness Certification

c. Staffing

The responsibility of determining and documenting rent reasonableness should be assigned to program staff in the following order of preference:

1. Staff conducting the housing inspection will be responsible for determining and documenting rent reasonableness.
2. The case manager will be responsible for determining and documenting rent reasonableness.

d. Determining Appropriate Comparable Units

Each and every certification of rent reasonableness must consider the following:

- *Location:* It is important that, not only are the properties close in proximity, but that they have similar access to services such as bus lines, grocery stores, and other public amenities and are within the same school boundaries where possible.
- *Age of the Unit and Year of Renovation.* This information is available by conducting an on-line property search through the Snohomish County Assessor's Office. [Assessor | Snohomish County, WA - Official Website \(snohomishcountywa.gov\)](http://Assessor | Snohomish County, WA - Official Website (snohomishcountywa.gov))
- *Size:* Number of bedrooms and bathrooms in the unit and the square footage of the unit.
- *Building Type:* Single Family Home; Townhome, Duplex/Triplex, 4-19 unit buildings/complexes, or 20+ Unit buildings/complexes.
- *Amenities:*
The following unit and on-site amenities may have an effect on the amount of rent the unit commands assuming that it is in good repair and desirable within the market:
 - Unit Amenities:
 - Air Conditioning
 - ADA Accessibility
 - Balcony/Patio/Deck
 - Dishwasher
 - Fireplace
 - Washer/Dryer in Unit
 - On-Site Amenities:
 - Carport/Garage/Off Street Parking
 - Club House/Recreation Room
 - Elevator
 - Fenced Yard
 - Laundry Facilities
 - Playground
 - Pool
 - Security
 - Storage Outside of Unit
- *Unit Condition:* Quality of floor coverings, cabinets, appliances, windows and doors as well as how well the unit has been maintained may make units more or less desirable and may affect the amount of rent the unit commands.
 - *Good* – well maintained and in working order
 - *Fair* – in expected condition for its age (normal wear and tear), in working order; minor repairs needed
 - *Poor* – obvious deferred maintenance, not in working order, major repairs/rehab needed
- *Location Accessibility:* Proximity to public transportation, parks, libraries, community centers, etc.
- *ADA Accessibility:* Unit and building ADA accessibility

- *Utilities – utilities paid by the tenant that are not included in the rent. **Eligible** utility costs **may include** electricity, gas/oil, water, sewer, and garbage. Other utility costs are **ineligible** and **must be excluded** including telephone, cable, satellite television service, and internet.*

e. Data Sources

Data used must be current. Acceptable data sources used in determining rent reasonableness include the following:

- Newspaper ads (including internet versions of newspaper ads);
- Classified Ads;
- Weekly or monthly neighborhood or shopper newspapers that have rental listings;
- “For Rent” signs in windows or on lawns;
- Real estate agents; and
- Property management companies that handle rental property; and
- Rental Listing websites including:
 - www.zillow.com
 - www.apartmentguide.com
 - www.apartments.com
 - <https://seattle.craigslist.org/sno/>
 - www.facebook.com/marketplace/
 - <https://hotpads.com>
 - www.padmapper.com

Data Sources in Rural Areas

While there may be fewer rental units in rural areas than in urban and suburban areas, it is possible to find comparable rents for different unit types located in these areas.

- U.S. Department of Agriculture (USDA)’s Rural Development Agency: one source of rental housing data for rural areas may be the USDA’s Rural Development Agency. USDA provides direct and guaranteed loans for single and multi-family housing development in rural areas as well as for farm laborers. Contact information for Rural Development State and Local Offices or USDA Service Centers is available at [Contact Us | Rural Development \(usda.gov\)](http://www.usda.gov/contact-us/rural-development). Each Rural Development Office, if it has a Rural Housing component, should have information on the types of rental housing available in various communities throughout the state, as well as unit sizes and rents.
- Real estate agents: another potential source of comparable rent data are real estate agents. Local real estate agents are not only knowledgeable about real estate prices but often are a source of information on rental housing in the area. They may be able to extrapolate rent comparables based on the general cost of housing in the area. To find real estate agents active in particular communities, certifiers can consult the National Association of Realtors on the web at [National Association of REALTORS® \(nar.realtor\)](http://www.nar.realtor). For demographic information on the housing stock, market trends, etc., certifiers should access [Research and Statistics \(nar.realtor\)](http://www.nar.realtor/research-and-statistics).

f. Strategy for Addressing Special Cases

There may be instances where the above methodology and process is not sufficient to establish rent reasonableness for a particular unit.

For example, staff may find in rural areas that there are only one (1) or two (2) comparable units instead of the three (3) units required for reliability.

Recipients may use alternative methods to determine and document rent reasonableness in the following circumstances:

- In rural areas where it may be difficult to find three (3) comparable units.
- In assessing units with an accessibility feature that the tenant requires due to a disability where it may be difficult to find three (3) comparable units.
- In urban areas where it may be difficult to find three (3) comparable units in building types that are less common in the particular market area (e.g., duplexes).

Alternative methods may include: 1) locating units that have the same number of bedrooms in the same type of building but in a broader geographic area to the minimum extent necessary to find three (3) comparable units, and 2) locating units that have the same number of bedrooms in the same geographic area but in other types of buildings that are most comparable to the building in which the proposed unit is located to the minimum extent necessary to find three (3) comparable units. The recipient must document why the alternative method was used in the participant file.

In special circumstances where three (3) comparable units cannot be found, Recipients should seek guidance from Snohomish County.

g. Special Note Regarding Fair Market Rent

Fair Market Rent (FMR) and rent reasonableness are separate and distinct. The gross rent (rent plus the cost of tenant-paid utilities) for units receiving ESG-[rental assistance](#) and CoC-[leasing](#) funds may not exceed the HUD Determined FMR. Therefore, the proposed gross rent for these units must be both rent reasonable and at or below the FMR. In addition, if the reasonable rent for the unit is less than the FMR, then the allowable gross rent may not exceed the reasonable rent. The gross rent for units receiving CoC-[rental assistance](#) funds may exceed FMR, as long as the unit is rent reasonable. For CoC and ESG Recipients, refer to the CoC-ESG Local Standards for further detail.

II. Completing a Rent Reasonable Analysis

a. Rent Reasonableness Certification

A Rent reasonable analysis must be completed by locating and analyzing three (3) comparable units in the same market area on a unit-by-unit basis by using other data sources. In order to ensure a reasonable market sample, the units for the analysis must each be located in a different building/complex in the market area and also be located in a different building/complex than the proposed unit. Refer to the [Data Sources](#) section above for a list of acceptable data sources. Data used must be current as rents vary over time with market changes.

b. Important Factors

In completing the analysis, the certifier must consider the features listed in [Determining Appropriate Comparable Units](#) above to ensure that the proposed unit is “comparable” to the three (3) units reviewed. The certifier should select units that are as similar as possible to the proposed units and should take a commonsense approach to valuing a unit based on the features listed. While information on most of the features should be readily obtainable, it may be that information for one or more of the features is not.

The certifier should focus on the most important factors that explain differences in rent, including location, number of bedrooms, building type, square footage, age, and certain amenities that impact market cost. Sufficient information about the evaluation process must be included to demonstrate that the units selected are comparable and to support the determination that rent for the proposed unit is reasonable.

c. Gross Rent

Gross Rent (Rent plus Tenant-Paid Utilities): To compare the proposed unit's rent to the average rent for comparable units, gross rent must be compared to gross rent. Gross rent is the rent plus the cost of all tenant-paid utilities, except telephone, cable or satellite television service, and internet service. For the purposes of determining gross rent, tenant-paid utilities may include gas, electric, water, sewer, and garbage.

Where rent (per the lease) does not include utilities, a utility allowance for tenant-paid utilities is added to the contract rent to determine the gross rent. This generally means that the proposed unit's rent *plus a utility allowance for actual tenant-paid utilities* is compared to the average rent for comparable units *plus a utility allowance for tenant-paid utilities*.

For units located in Snohomish County, use the utility allowance established by the local Public Housing Authority (PHA) – the Housing Authority of Snohomish County (HASCO). Refer to the utility allowance schedule for the applicable building type that is current on the date the rent reasonableness certification is made. HASCO posts a different utility allowance schedule for: 1) detached homes, and 2) duplex, high-rise, low-rise and townhomes. These schedules are updated annually and may be found at [Forms & Documents - HASCO](#).

In some instances, units may be located outside of Snohomish County (where allowable under the contract and, for CoC and ESG funds, where meet the requirements of Mobility for Participants Receiving Tenant-Based Rental Assistance in the Snohomish County Health Local Standards). In these instances, use the utility allowance schedule posted by the local Public Housing Authority (PHA) for the area where the unit is located.

d. Determination of Rent Reasonableness

If the requested gross rent for the unit is equivalent to, less than, or no more than \$100 higher than the average gross rent being charged for the comparable units, the unit is considered rent reasonable.

If the requested gross rent for the unit is more than \$100 higher than the average gross rent being charged for the comparable units, the unit is NOT considered rent reasonable and it may not be approved for rental assistance subsidy.

e. Documentation Requirements

The rent reasonable analysis must be documented in the participant files following the documentation requirements outlined in [Documentation Requirements](#).

III. Owner's Rent Charged for Comparable Unassisted Units

In addition to certifying that the proposed unit's rent is reasonable in relation to at least three (3) comparable unassisted units, Recipients must also certify that the proposed unit's rent is reasonable in relation to rents currently being charged by the same owner for comparable unassisted units. This ensures that the same owner/property manager does not charge more for assisted units than unassisted units.

If the owner is currently leasing other comparable unassisted units, this may be completed by obtaining written verification signed by the property owner/manager that the rent for the proposed unit is the same as or lower than the rents for other comparable unassisted units leased by the same owner. Recipient may consider using a Request for Tenancy Approval form as written documentation for this item [Request Tenancy approval52517.pdf \(hud.gov\)](#).

If the owner is *not* currently leasing other comparable unassisted units (e.g., the proposed unit is the only one-bedroom unit leased by the same owner), this may be completed by obtaining written verification signed by the property/owner manager that the rent for the proposed unit is the same as or lower than the rent previously charged for the proposed unit.

If the rent for the proposed unit is greater than the rents charged by the same owner for comparable unassisted units, the owner must provide reasonable justification for the unit to be considered rent reasonable (e.g., the proposed unit is the only ADA-accessible one-bedroom unit leased by the owner or the proposed unit was recently renovated, etc.).



Attachment C

Rent Reasonableness Certification

Client Name: _____

I. PROPOSED UNIT INFORMATION	Landlord Information
Street Address: _____	Name: _____
Unit #: _____	Street Address: _____
City: _____	Unit #: _____
State, Zip: _____	City: _____
Year Constructed: _____ Sq Ft: _____	State, Zip: _____

Total # of Bedrooms in Unit: ☐ 0Bd ☐ 1Bd ☐ 2Bd ☐ 3Bd ☐ 4Bd ☐ 5Bd ☐ 6Bd
☐ Other, Describe: _____

Shared Unit? ☐ Yes ☐ No If YES, # of Bedrooms in private space that Client will be using: _____

Building Type as defined by the Utility Allowance Schedule

☐ Detached Home ☐ Duplex, High Rise, Low Rise, and Townhome

II. PROPOSED UNIT GROSS RENT *a) Proposed Contract Rent + b) Utility Allowance = c) Gross Rent*

a) Proposed Contract Rent: \$ _____

b) Utility Allowance (for tenant-furnished utilities), if any: \$ _____

c) Gross Rent (add II.a. and II.b.): \$ _____

III. OWNER'S RENT CHARGED FOR COMPARABLE UNASSISTED UNITS

(1) Owner is currently leasing comparable unassisted units: ☐ Yes ☐ No

If YES, indicate the rent currently being charged by the same Owner for comparable unassisted units.

If NO, indicate the Owner's most recently charged rent for the proposed unit.

a) Owner's Contract Rent: \$ _____

b) Utility Allowance (for tenant-furnished utilities), if any: \$ _____

c) Gross Rent (add IV. a) and b)): \$ _____

d) Amount of rent increase, if any: \$ _____

Owner's reason for increase (if any) is justified: ☐ Yes ☐ No ☐ N/A

If unit rent is increased compared to other rent being charged for comparable unassisted units, indicate any justifications (e.g. market increase, recent renovations, etc.).

(2) How you determined that the proposed contract rent does not exceed Owner's rent charged for comparable unassisted units

IV. RENT REASONABLENESS CERTIFICATION

	Proposed Unit	Unit #1	Unit #2	Unit #3
Source of Information:				
Street Address:				
Unit #:				
City:				
State, Zip:				
Year Constructed:				
Year Renovated, if applicable:				
Square Footage:				
Total # of Bedrooms in Unit:				
Total # of Bathrooms in Unit:				
Building Type: (Single Family, Townhome, Duplex/Triplex, 4-19 Unit, 20+ Unit)				
Amenities (list): <u>Unit</u> : (washer/dryer, A/C, dishwasher, fireplace, balcony/patio, etc.) <u>On-site</u> : (parking, laundry room, pool, playground, storage, security, fenced yard, elevator, clubhouse/rec room, etc.)				
Unit Condition: (good, fair, or poor)				
Location Accessibility: (public transportation, parks, libraries, community centers, etc.)				
ADA Accessibility: (yes or no)				
Utilities <i>not</i> included in rent: (electricity/gas/oil, water, sewer, garbage)				
Unit Rent:	\$	\$	\$	\$
Utility Allowance:	\$	\$	\$	\$
Gross Rent:	A. \$	B. \$	C. \$	D. \$

1. **Gross Rent for Proposed Unit (Unit A):** \$

2. **Average Gross Rent for Comparable Units (Units B, C, and D):**

$$\frac{\$ \text{ Total Gross Rents}}{\text{divided by } 3 \text{ \# of Comparable Units}} = \$ \text{ Average Gross Rent}$$
 (Add Gross Rents of Units B + C + D)

3. **Average Gross Rent for Comparable Units + \$100:**

$$\$ \text{ Average Gross Rent for Comparable Units} + \$100 = \$$$
 plus

4. **Is the Gross Rent for Proposed Unit (Unit A) in Question IV.1. equal to or less than the Average Gross Rent for Comparable Units + \$100 in Question IV.3.?**

☐ Yes ☐ No

5. (If applicable) If an alternative method for unit comparison was utilized to determine rent reasonableness, indicate:
a.) the justification for use (i.e. rural area with fewer than 3 comparable units, area with fewer than 3 comparable units with required accessibility features, OR urban area with fewer than 3 comparable units due to less common building type) AND b.) the approved alternative method used (i.e. expanding geographic area by minimum extent necessary to locate additional units that have same number of bedrooms in same type of building OR locating units in the same geographic area that have same number of bedrooms in other building type that is most comparable to proposed unit to minimum extent necessary).

a. Justification:

b. Approved Alternative Method:

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit:

☐ **IS** rent reasonable (answered yes to Question IV.4. above). May be approved for rental assistance subsidy. Complete Section V. below for Fair Market Rent requirements.

☐ **IS NOT** rent reasonable (answered no to Question IV.4. above). May not be approved for rental assistance subsidy.

Staff Name: _____ Title: _____

Signature: _____ Date: _____

V. COMPARISON TO FAIR MARKET RENT (FMR)

Determine whether the specific program allows for rent reasonable units up to the FMR (i.e. capped at FMR) or allows rent reasonable units above the FMR.

A) Published FMR for the unit: \$

B) Is the Gross Rent for the Proposed Unit less than or equal to (\leq) the Published FMR? ☐ Yes ☐ No

C) Check the box below for the Funding Source and FMR Requirements applicable to the Proposed Unit.

	Funding Source	Fair Market Rent (FMR) Requirement
<input type="checkbox"/>	SDG/EHP/ESG Rental Assistance	<ul style="list-style-type: none"> Unit gross rent may not exceed FMR Must be rent reasonable Grant funds may pay up to FMR Maximum funds may pay is lower of rent reasonableness amount and FMR
<input type="checkbox"/>	CoC/YHDP Rental Assistance	<ul style="list-style-type: none"> Unit gross rent may exceed FMR Must be rent reasonable Maximum funds may pay is rent reasonableness amount
<input type="checkbox"/>	CoC/YHDP Leasing	<ul style="list-style-type: none"> Unit gross rent may exceed FMR Must be rent reasonable Grant funds may pay up to FMR; any amount above this must be paid with other funds Maximum funds may pay is lower of rent reasonableness amount and FMR

This **Rent Reasonableness Certification** is to be used in conjunction with the **Rent Reasonableness Policies and Procedures:**
[Continuum of Care \(CoC\) Program | Snohomish County, WA - Official Website \(snohomishcountywa.gov\)](https://www.snohomishcountywa.gov/continuum-of-care)

Rental Assistance Agreement

This Rental Assistance Agreement is entered into between _____ (“Agency”) and _____ (“Owner”).

The purpose of this Agreement is to assist the Household identified in Section I below to lease a decent, safe, and sanitary dwelling unit from Owner. Agency will make rental assistance payments to the Owner on behalf of Household in accordance with this Agreement.

I. Dwelling Unit and Household

This Agreement applies only to the Household and Dwelling Unit designated below. Owner has leased the Dwelling Unit to the Household through a separate and distinct lease agreement.

Dwelling Unit (“Unit”) _____

Head of Household _____

II. Term of Agreement

The term of this Agreement shall begin on _____ and shall end upon 30 days written notice from Agency.

III. Rental Assistance Payment

The Agency agrees to pay a portion, as determined and calculated solely by the Agency, of the Unit rent. This amount is subject to change at any time during the term of this Agreement. Any portion of the rent that is paid by Agency will be paid to Owner on or about the first day of the month for which the Unit rent is due. The rental assistance payment is equal to the difference between the Unit rent and the rent paid by the Household; at no time shall the rent paid by the Household and the rental assistance payment exceed the Unit rent. The Agency assumes no obligation for the Unit rent, or payment of any claim by the Owner against the Household, for damages or other amounts owed to the Owner.

IV. Notification to the Agency

During the term of this Agreement, Owner agrees to provide Agency with a copy of the following documentation:

- A. Amendments to the lease agreement between the Owner and the Household, including but not limited to, changes in rent, utilities, ownership or mailing address; and
- B. Notices to the Household, including but not limited to, notices to comply, terminations of tenancy, or eviction.

Agency**Landlord/Owner**_____
Signature_____
Signature_____
Typed/Printed Name of Representative_____
Typed/Printed Name of Representative_____
Date_____
Date

APPENDIX 1 to PR-15

2025 Consolidated Plan and 2025 Annual Action Plan - Public Comments

Public Hearing on December 12, 2024, and a 30-Day Public Review and Comment Period on the Draft 2025-2029 Consolidated Plan & 2025 Action Plan from April 8, 2025, through May 8, 2025

#	Comment	HSD Response
#1	<p>Arabeth Crystal Lindberg: Hello, My Name Is Arabeth Crystal Lindberg, I Got Your Information From My Brother, In Regard To The Upcoming Housing Meeting On November 19th, (My Hot Take On The Housing Situations Is There's Not Allot Of Helpful Resources Available Anymore) It Breaks My Heart Knowing There's Not Enough Places That Are Willing To Help Those In Need, My Mom Was Homeless Over 20 Years Ago And We Are Trying To Figure Out How To Not Becoming Homeless Now.</p> <p>My Family Has Tried Everything We Can Think Of To Get Us Into A New Place, Currently We Are Staying In Hotels, We've Tried 211 Resource Number They Can't Help Unless My Family Is Physically And Chronically Homeless.</p> <p>Back Story Is My Aunt Bought A House For Me And My As An Inheritance Blessing Gift, Unfortunately She Changed Her Mind And Now My Family Is In The Situation By No Fault Of Our Own.. Please Note That We Never Received The Signed Copy Of Our Lease. My Phone Number Is I'm Willing To Speak To You On The Phone About My Situations As A Whole</p> <p>Thanks' In Advance.</p>	<p>The County appreciates the comments provided by MS. Lindberg and acknowledges that the current affordable housing crisis has impacted many Snohomish County residents and acknowledge that there are not enough resources to meet all of the need. The purpose of the consolidated planning process, required to received funding from the U.S. Department of Housing and Urban Development (HUD), is to determine what the priority needs are in the county and to develop strategies to effectively address them with the limited funding available.</p> <p>The CDBG public services and ESG funding allocated in the 2025 Action Plan, are prioritized to serve the lowest income individuals and households and/or those who are homeless, at risk of homelessness, or have other special needs.</p>
#2	<p>Conchita Chinchilla: Since I am unable to participate in the public hearing in person, I wanted to send you my ideas on the questions presented: In my experience working with families and students and</p>	<p>The County thanks Ms. Chinchilla for the comments and recommendations.</p> <p>There is a required and established process for the development of the Consolidated Plan, which guides the funding for each Annual Action Plan. The process begins with analyzing the needs within the County and proposing</p>

<p>from my personal experience as a resident of this County, here are my personal and individual comments:</p> <p>What are the most important needs for low- and moderate-income people and neighborhoods In Snohomish County:</p> <ul style="list-style-type: none"> • Affordable housing / affordable rent rates based on income • Economic development for our families of color • Affordable public services <p>How should limited federal funds be used to help meet these needs over the next five-years?</p> <p>Include in the discussion people who are facing the challenges. For example, if it is transportation, include people that use public transportation. Those who are facing the challenges should be the ones leading the conversation. Detect where is the biggest amount of those funds going to? Consolidate services. We are too many organizations doing the same thing, so funds are not being channeled effectively. Why not have hubs with resources where all organizations can provide the same services across the board. Train more people to do case management to provide comprehensive services rather than just giving people a list of resources that they need to call.</p> <p>Learn about and provide input on the 2023 program year performance under the Snohomish County 2020-2024 Consolidated Plan.</p> <p>Sincerely reflect on how the data is really collected (who is participating)?</p> <p>Prepare meetings at schools, where parents and families can express their thoughts and ideas (not complaints) but possible and doable solutions in structured meetings. In the data presented, which is the base for the plan, the focus group is too small to represent everyone in the county. Look for more representation for better and more</p>	<p>strategies to meet those needs. Through the needs assessment and market analysis, we evaluate needs in the areas of affordable housing, infrastructure, homelessness, special needs, and community development. Information is gathered through consultation with local agencies, public outreach, a review of demographic and economic data sets, and a housing market analysis which forms the basis of the strategic plan. The strategic plan details how the Consortium will address its priority needs and strategies to reflect current conditions of the market, expected availability of funds, and local capacity to administer the plan.</p>
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	<p>focused and customized solutions to those challenges. As a resident of this County, I have heard multiple times and I am part of those voices too, that we want data that show the reality that people who are working hard to keep up with their budgets, can express and the realities that they are facing day to day.</p> <p>We need more prevention and not reaction to those challenges, because sometimes is too late. If there are some questions about my comments and you'd like us to have a conversation, I am open to it. Please consider my comments as specific from me. I want to clarify that my opinion is personal and not an official opinion from the organization that I work for. Thank you so much for allowing all voices to be heard, in person and in writing.</p>	
#3	<p>Duane Leonard, CEO Housing Authority of Snohomish County (HASCO): Please accept my input and belief that Affordable Housing is the most important need for our low-income community members. Far too many people are severely rent burdened to the point where housing instability is even affecting the middle class. I receive numerous emails every week from people looking for assistance or more affordable housing options.</p>	<p>The County thanks Mr. Leonard for the comment. The Consortium has partially funded three affordable housing projects in the 2025 Annual Action Plan. One affordable housing project is anticipated to preserve affordable housing by upgrading the infrastructure for a manufactured home park for low-income seniors and persons with disabilities. Two new construction projects are recommended for funding and will assist with the development of 118 affordable housing units targeted to households at 30% and 50% of area median income.</p>
#4	<p>Anne Hoffman: I wanted to share an idea about helping two segments of our community to access rooms for rent and subsidized waitlists, to avoid slipping into homelessness.</p> <ul style="list-style-type: none"> • The populations that I see not being served, in Homelessness Prevention, are disabled adults under the age of 60 receiving only SSI and Seniors who have only SS income. • These two groups can only afford a room for rent, sometimes only barely. • These two groups need to apply for subsidized housing waitlists. • These two groups more often than not, do not have computer skills to look for rooms for rent or apply online for subsidized housing waitlists. 	<p>The County acknowledges the need for assistance to our most vulnerable community members and thanks Ms. Hoffman for the comments.</p> <p>A percentage of Community Development Block Grant (CDBG), HOME, and all of the Emergency Solutions Grant (ESG) funds are targeted to programs and services to assist persons who are homeless, or at-risk of homelessness, including persons living with special needs. The County appreciates the input provided and recognizes that the actual need in the community exceeds the resources available and will continue to work toward resolving the affordable housing crisis.</p>

	<p>I learned this short-term/long-term approach to housing people immediately, while addressing the long-term need of affordable housing while working at EHA Hope Options, a program for Seniors. These people need to sit with someone and work on the computer to get the housing solutions they need. If practiced this approach would limit the amount of homeless entering long-term homelessness.</p> <p>Two centers in our community that VOAWW Homelessness Prevention could collaborate with are Carl Gibson Center and Carnegie Resource Center. Staff could meet with clients in need in person at the center that makes most sense. A side positive outcome is that the community members in need would then be introduced to these two hubs of support and connection.</p>	
#5	<p>Wayne Wayson: I am so thankful to live in a country and community with such generosity and caring. I am proud of our country, state, and local areas who provide this support. Although I am one individual and we are one family, it is a privilege and honor to be even a small part of the help to others.</p> <p>The company I worked for was acquired earlier this year. As a result, myself and several fellow co-workers were laid off. While searching for new full time employment, I am currently receiving unemployment support, which I and my employers have paid into for many years.</p> <p>I am working part-time jobs to make ends meet. I get to work tomorrow, so I am unable to attend the public hearing to provide my comments in person. Therefore, I would like to submit my brief comments via email.</p> <p>I am very concerned about our local county, cities, and rural areas accepting federal funds. As a taxpayer, it is the taxes collected from myself and all working people that goes to these programs.</p>	<p>The County thanks Mr. Wayson for the comments.</p> <p>The U.S. Department of Housing and Urban Development (HUD) awards annual grants to entitlement communities and states throughout the United States, to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.</p>

	<p>The program information states "ESG Program.... to help people....at risk of homelessness."</p> <p>More and more money is being taken from working people and given freely to people who are not willing to work. The amount workers and homeowners are being taxed continues to rise. Everyone is impacted by the increased cost of basic needs. I submit to you these programs may be creating it so more families are at risk of homelessness. Therefore, in the long run, the bad impact outweighs the very temporary benefits of these programs.</p> <p>I see and hear every day, what I consider, a severe misuse of the support provided to people. For example, SNAP (formerly EBT) is being used for luxuries and not for essential benefits. I hear time and time again about seniors who don't have a mortgage payment but must sell their home because they cannot afford the taxes. These are just a couple of examples.</p> <p>It appears to me that the state, county, and local areas, though it may be well intentioned, are using these funds more for growth than assistance. I would like to see limited federal funds being used and encouragement (aka expectation) for individuals to be more self-reliant by working.</p>	
#6	<p>Brian K. Houk: I won't be able to attend the Zoom meeting because I'll be at work, but I do want to share one primary thought/concern.</p> <p><u>Infrastructure?</u></p> <p>I have lived and visited many places, and I like Washington the best, except for the rising prices and congestion. I have lived here, off and on (military), since 1978.</p> <p>It seems this state allows for business and housing to be built, and then plans for the infrastructure (power, sewer, roads, drainage, etc.) are made afterwards. Then, expect the people who were already living here to pay for the infrastructure for the new residents.</p>	<p>The County thanks Mr. Houk for the comments.</p> <p>The federal funding for the 2025-2029 Consolidated Plan and 2025 Annual Action Plan is received by Snohomish County Consortium (Consortium), an entitlement community. The Consortium is a partnership between Snohomish County and most of the cities and towns within the County. The partnership is established through an Interlocal Agreement and allows the Consortium, as an Urban County, to received approximately \$5 million dollars in federal funding each year as formula grants under Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) programs.</p>

<p>That is not fair and backwards. You need to make it a requirement that developers pay the cost of bettering the infrastructure before building. Need to look at the bigger picture. Case in point: Everett required Boeing to pay for the I-5 flyover before allowing the 777 to be built.</p> <p>This is one of the many reasons the elderly move out of state or have to sell their homes: they have been taxed out of their homes.</p> <p>Also, every time contractors have to cut into roads to tap into services, the patch job they leave behind is worse than what was there. What is left behind are damaged vehicles, and the state, county, or city has to foot the bill to fix the roads. Still, the developers have made their money and walked away, leaving them no longer responsible for anything, including people's vehicles' life spans being shortened.</p> <p>In light of today's society, I am becoming a bigger supporter of responsibility and accountability on everybody's part. I hold those in positions of power and authority to a higher standard. I am so tired of seeing people in business and politics getting sweetheart deals, and when they do bad things, they are given the golden handshake, and they walk away scott free. Then it is left to the employees and taxpayers to foot the bill again and again... No wonder so many taxpayers are so anti-tax and rebellious. It is the low and middle-income people that this housing proposal is all about, and they are always the ones who get hurt.</p> <p>PS...I was in the Air Force 4 years active, 6 years reserve, a Boeing employee since 1989, and currently live in Marysville. I used to own a house in Everett.</p> <p>Thank you for your time, and I hope my opinions have some influence. I would like to hear back.</p>	<p>The funding allocated under these programs is targeted to primarily benefit low- and moderate-income households through the construction and preservation of affordable housing, provisions of public services, and the construction and rehabilitation of public facilities and improvements located in low- and moderate income neighborhoods.</p>
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