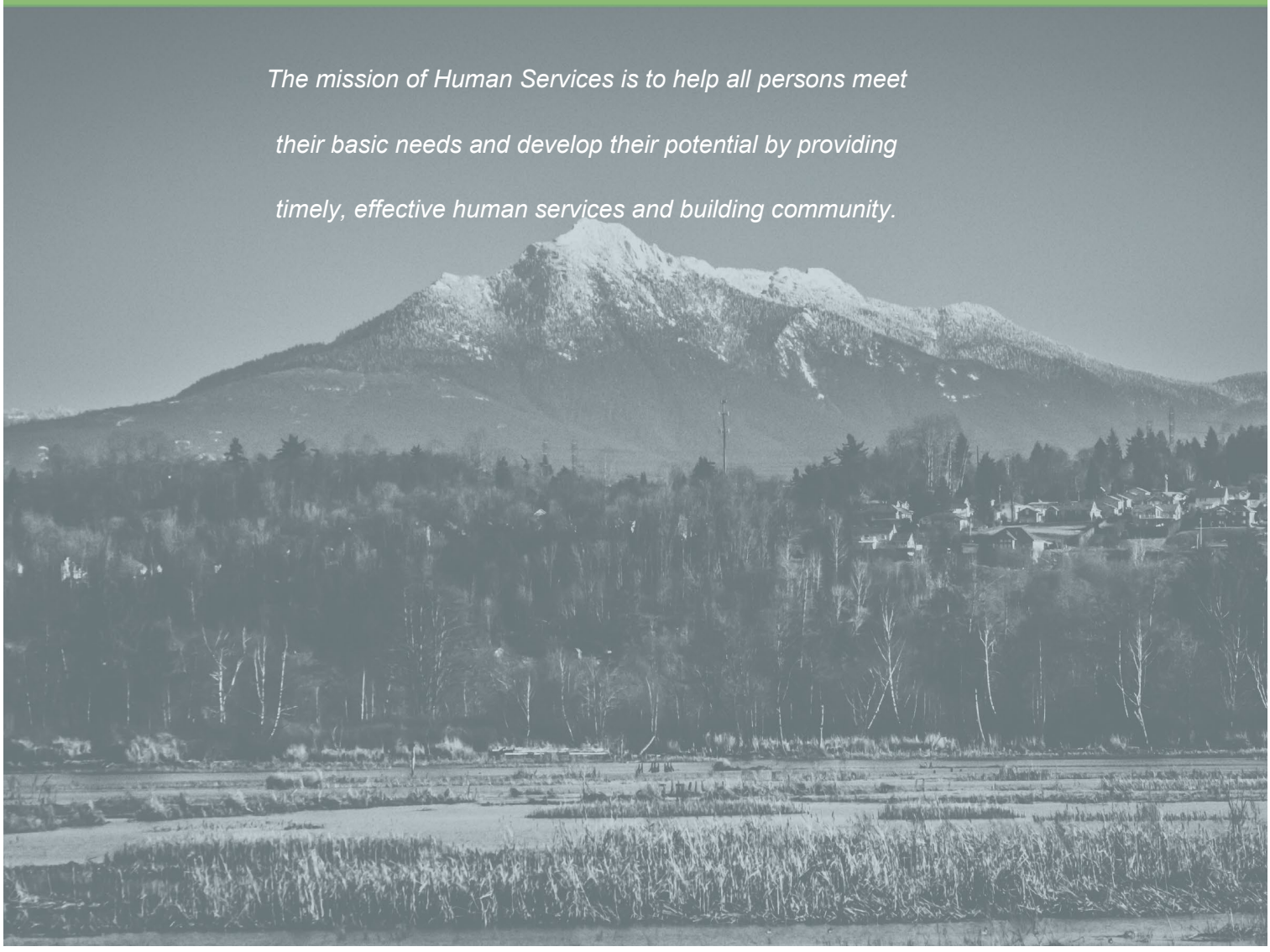
Snohomish County

Human Services

2026

SNOHOMISH COUNTY URBAN COUNTY CONSORTIUM 2026 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

2026 Annual Action Plan

Lead Grantee Template

OMB Control No: 2506-0117 (exp. 09/30/2021)

Snohomish County Urban County Consortium
2026 Annual Action Plan

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Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

The 2026 Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) to receive federal grant funds available under the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The plan serves as local planning documents and applications to HUD for these funds.

Grant funds may be used for affordable housing, facilities providing public or community services, infrastructure improvements such as streets, sidewalks, and water and sewer systems, public services, homeless programs, and economic development activities. In addition, funds must be used primarily to benefit low-income persons and neighborhoods in Snohomish County.

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 Cities of Everett and 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 and are the lead agencies for those CDBG funds.

This document is the Snohomish County Consortium - Lead Grantee Template of the 2026 Action Plan for the Snohomish County Consortium CDBG, HOME, and ESG funds and this Executive Summary is the Executive Summary for the Lead Grantee Template.

Investment of the grant funds is guided by priority community needs and goals set forth in the adopted 2025-2029 Consolidated Plan, prepared in 2025, 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. The plan was also informed by quantitative and qualitative data, existing plans and reports, and general research. Additional citizen participation and consultation activities were conducted during development of the 2026 Annual Action Plan and are summarized below.

The 2026 Action Plan is the second year action plan under the 2025-2029 Consolidated Plan and covers the period of July 1, 2026, through June 30, 2027. It identifies the amount of CDBG, HOME, and ESG grant funds available for the 2026 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. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan. This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis, or the strategic plan.

For the 2026 program year there is $5,859,735.52 in funding under CDBG, HOME, and ESG programs is available to the Snohomish County Consortium to help meet the five-year goals in the 2025-2029 Consolidated Plan. This includes:

- $3,402,659 in 2026 CDBG Grant Funds,
- $30,000 in Estimated 2026 CDBG Program Income,
- $1,847,275.74 in 2026 HOME Grant Funds,
- $288,916.78 in 2025 HOME Program Income, and
- $290,884 in 2026 ESG Grant Funds.

All the activities selected to receive funds under the CDBG, HOME, and ESG programs for the 2026 program year through the Snohomish County Consortium will help address priority needs and goals in the 2025-2029 Consolidated Plan. The $5,859,735.52 in available grant funds is allocated as follows:

- $2,928,317 for Affordable Housing Projects & Programs,
- $1,254,380 for Public Facility & Infrastructure Projects,
- $514,898 for Homeless, Special Needs, and Fair Housing Service Projects,
- $269,068 for Homeless Shelter, Rapid Rehousing, and Homeless Management Information System, and
- $893,073 for Grant Planning & Administration

3. Evaluation of past performance under the 2024 Program Year (July 1, 2024, through June 30, 2025)

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects. This section is a review of the 2024 Action Plan program year from July 1, 2024, through June 30, 2025.

The Draft 2024 Consolidated Annual Performance and Evaluation Report (Draft 2024 CAPER) provided an evaluation of progress made during the 2024 program year towards the goals and strategies outlined in the 2020-2024 Consolidated Plan and 2024 Annual Action Plan of the Snohomish County Urban County Consortium (Consortium). The goals and strategies are intended to help address high priority needs for affordable housing and non-housing community development for low- and moderate-income people and neighborhoods and the summation of progress made during the 2020-2024 Consolidated Plan.

The 2024 program year covers the period of July 1, 2024, through June 30, 2025. The goals in the 2020-2024 Consolidated Plan and 2024 Annual Action Plan are supported with federal funds made available to the Consortium under the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), Emergency Solutions Grant (ESG) programs, and supplemental CDBG funds to prevent, prepare for, and respond to the Coronavirus (CDBG-CV). The strategies include activities undertaken with these funds as well as with other federal, state, and local funds, where applicable. Highlighted accomplishments of projects completed in the 2024 program year with CDBG, CDBG-CV, HOME, and ESG funds are summarized below. Tables comparing the proposed annual and five-year goals and the actual accomplishments with an assessment of progress are also included.

Meeting Affordable Housing Needs in Our Community

• 190 homeowners countywide received home repair and home rehabilitation assistance.
•3 low-income first-time homebuyers received financial assistance to purchase homes located in Edmonds and Everett.
•New construction of eight units of affordable rental housing.
•19 low-income households received tenant based rental assistance.

Providing Needed Services in Our Community

•591 persons experiencing homelessness or at risk of homelessness received supportive services.
•460 non-homeless persons with special needs received supportive services, including elderly persons, victims of domestic violence, and persons with disabilities.
•283 persons received fair housing education and counseling services.
•683 persons received emergency shelter assistance.
•54 homeless households received rapid rehousing assistance.

Public Facilities & Infrastructure

- Rehabilitation of a senior center located in Arlington providing 665 seniors with an improved facility.
- The purchase of an advanced life support ambulance benefiting 2,040 persons living in and around the town of Darrington.
- Accessibility improvements were made to an auditorium in the City of Edmonds providing improved access for approximately 189 persons.
- Acquisition of a new rural tender fire engine was acquired which benefits 2,034 people living in and around the Town of Darrington.
- Rehabilitation and expansion of a food bank located near the City of Monroe providing improved access to 4,018 people.
- Construction improvements to a culinary training facility benefiting 134 low- and moderate-income persons in Snohomish County and Everett.

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 2021, 2022, and 2023 program years.

The 2024 program year was the fifth-year under the 2020-2024 Consolidated Plan. Overall, the Consortium made meaningful progress on meeting the five-year goal projections during the 2024 Action Plan. The COVID 19 pandemic and the prioritization of County and subrecipient staff time to address it, has impacted the Consortiums proposed accomplishments toward annual goals during the 2024 PY.

Meeting Affordable Housing Needs in Our Community

Progress was made toward CDBG affordable housing goal with the Minor Home Repair Program (MHRP) goal reaching 91% of the anticipated five-year goal in the 2020-2024 Consolidated Plan. The rental housing construction goal reached 76%, although there is one affordable housing project that is complete and ready to occupy, but was not closed out in IDIS by June 30, 2025, but included 11 HOME units. The Minor Home Repair Program five-year goal achieved 90% of the anticipated goal, and Tenant Based Rental Assistance achieved 50% of the five-year anticipated goal. Two of the nine housing goals, acquisition only and homeowner housing added, received no requests for funding in the past five-years.

Making Public Facility and Infrastructure (PF&I) Improvements in our Community

Due to the challenges created by COVID-19, PF&I projects that included construction had been significantly impacted and funded projects could not move forward as planned. During the 2024 PY seven public facility and Infrastructure projects have been completed, and many others are now moving forward and are under construction, or are completed and finishing up labor standards. Two of the four five-year public facility goals were achieved exceeded the five-year goals.

Providing Needed Services in Our Community

The public services five-year CDBG non-homeless goal was exceeded by 10% and the ESG Rapid Rehousing five-year goal was exceeded by 20%. The CDBG public service's five-year goal for homeless persons reached 72% of the anticipated goal and fair housing reached 51% of the anticipated five-year goal.

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.

4. Summary of Citizen Participation Process and Consultation Process

Snohomish County conducted citizen participation and consultation activities for development of the 2026 Draft Annual Action Plan. Opportunities for input were provided during different stages including an initial public hearing, citizen representation (including minorities, low- and moderate income persons, seniors, and persons with disabilities) on the Technical Advisory Committee and the Policy Advisory Board, a 30-day public review and comment period from March 24, 2026, to May 11, 2026, a public hearing on the Draft 2026 Annual Action Plan on April 8, 2026, and a public meeting of the Snohomish County Council prior to their approval of the final plan.

Outreach methods for the public hearings included newspaper ads, sending emails to distribution lists inviting participation in the public hearing and the 30 day public review and comment period, internet postings, press releases, and distribution and posting of flyers. The flyers were translated into Russian, Vietnamese, Korean, Chinese (simplified), Arabic, Marshallese, and Spanish. The hearings were conducted as virtual meetings and requests for reasonable accommodations and language interpreters were available upon request.

Outreach methods for the initial public hearing included publication of a newspaper ad in the newspaper of general circulation in Snohomish County and providing notice of the hearings through email distribution lists, internet postings, a press release, and flyers in Russian, Vietnamese, Korean, Chinese (simplified), Arabic, Marshallese, and Spanish. Those not able to attend the hearings were able to submit comments in writing via email or mail, or in an alternate format upon request.

Reasonable accommodations were available upon request to enable persons with disabilities to fully

participate in the virtual public hearing, to submit a comment, or to make the plan available in an alternate format. Foreign language interpreters for the hearings were also available upon request.

Outreach methods for the 30-day public review and comment period and public hearing on the Draft 2026 Annual Action Plan utilized these same methods and included a newspaper ad in the newspaper of general circulation, the Herald, a press release, notices and flyers sent to two email distribution lists, internet postings, posting of notices, and availability of copies of the draft plan upon request.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

One comment was received during the 30-day public review and comment period expressed concern and frustration regarding federal regulations toward a Rapid Rehousing program that would only allow a family of two to have two bedrooms instead of three. To view full comment please see Appendix 1 to AP-12: Public Comments.

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

No comments have been rejected.

7. Summary

Investment of 2026 CDBG, HOME, and ESG funds in the Snohomish County Consortium area is intended to help maintain and increase decent affordable housing options and to help make suitable living environments more available and accessible throughout Snohomish County.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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 2026 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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For information on the City of Marysville Participating Grantee CDBG Template, please contact:

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For information on the City of Everett Participating Grantee CDBG Template, please contact:

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AP-10 Consultation - 91.100, 91.200(b), 91.215(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 2026 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.

Landlord engagement specialists 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and 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) regularly reviews and develops recommended updates to system performance standards by project type and population. Updated standards are adopted by the Partnership to End Homelessness Board and individual projects are monitored for performance against the standards by County staff as part of their ongoing monitoring activities.

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 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. Agencies, groups, organizations and others who participated in the process and consultations

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	Housing Homelessness Prevention 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?	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?	Chair and 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 (Homage)
	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 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 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 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.

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 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. 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 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.
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 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.
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 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.
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 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.
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 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.
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 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.

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

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	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.
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?	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.
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 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.
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 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.
35	**Agency/Group/Organization**	ODAT Service
	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 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.
36	**Agency/Group/Organization**	Edmonds Waterfront Center
	What section of the Plan was addressed by Consultation?	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.

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 email distribution lists, newspaper ads, flyers, public hearings, review of published reports, and other outreach efforts.

Narrative

Snohomish County, as lead agency of the Snohomish County Consortium, seeks 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 the 2025 – 2026 Annual Action Plans. This planning and coordination are expected to continue throughout the 2027-2029 Consolidated Plan period, including the 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 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.

AP-12 Participation - 91.401, 91.105, 91.200(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 2026 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 of all 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 resident representatives, including two resident seats for low-income persons, two resident seats for seniors, two resident seats for persons with disabilities, and two resident 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 on October 15, 2025, and on February 5, 2026.

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 on November 12, 2025, and March 11, 2026. 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 2026 Action Plan.

Citizen Participation Outreach

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, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified) Persons with disabilities	Two public hearings were conducted during the early development stages of the 2026 Action Plan on January 14, 2026, at 9:00 am and 5:00 pm. Four community members attended the 9:00 am public hearing and no community members attended the 5:00 pm hearing.	No comments were received at the hearing.		

2	Newspaper Ad	Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified) Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Newspaper ad announcing public hearings were placed in the Everett Herald, the newspaper of general circulation in Snohomish County.	Five public comments were received during the early development stages of the 2026 Annual Action Plan. Comments received include: suggestions for increased funding for public facilities and services needs in smaller cities in the County, specifically for childcare and early learning facilities, funding for improvements to community parks, preservation of affordable housing through minor home repair programs, preservation of single family homes for homebuyers, support for food		

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 nutrition programs for seniors and persons with disabilities, and continued funding for employment and educational services.		

3	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified) Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Internet outreach announcing the public hearings were 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 organizations, agencies, local governments and other interested persons maintained by the Snohomish County Human Services Department Office of Housing and Community Development, and the	See comments above under Newspaper Ad.		

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)
			Continuum of Care e-mail 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.			

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, Russian, Vietnamese, Arabic, Marshallese, Korean and Chinese (simplified) Persons with disabilities Non-targeted/broad community	A virtual public hearing on the Draft 2026 Annual Action Plan was held on April 9, 2026, at 11:00 am. Participants were able to ask questions and provide verbal or written public comments. Reasonable accommodations and language interpreters were available upon request.			

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	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Minorities Non-English Speaking - Specify other language: Spanish; Arabic, Russian, Marshallese, Korean and Chinese (simplified). Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A newspaper ad for the 30-day public review and comment period for the April 9, 2026, public hearing on the Draft 2026 Action Plan was placed in the Everett Herald.			

6	Internet Outreach	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, Local Governments	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 organizations, agencies, local governments and other interested persons maintained by the Snohomish County Human Services Department Office of Housing and Community Development.	See comments above under newspaper ad above.		

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)
7.	Public Meeting	Non-targeted/broad community	A public meeting of the Snohomish County Council General Legislative Session will be held in May or June 2026, to approve the 2026 Annual Action Plan.	Any Comments received will be stated here.		

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, broken out by year 2 (Program Year 2026) of the 2025-2029 Consolidated Plan period. 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 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	3,402,659.00	30,000.00	0	3,432,659.00	8,285,948.00	The 2026 CDBG allocation is actual and the 2026 CDBG program income is estimated.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,847,275.74	288,916.78	0	2,136,192.52	5,010,698.35	The 2026 HOME allocation is actual and the 2025 HOME program income is actual.

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: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	290,884.00.	0	0	290,884.00	859,500.00	2026 ESG annual allocation is Actual
Other	public - federal	Other	0	0	0	0	0	

Table 2 - 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 2 (Program Year 2026), it is estimated that CDBG, HOME, and ESG projects will have estimated contributing funds of over 150 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

There are no proposed projects on publicly owned land to report.

Discussion

Other federal, state, local, and private funds anticipated/estimated to be available to help address the needs and objectives in Year 2 (Program Year 2026) of this Strategic Plan include:

HUD Continuum of Care, $15,546,670

HUD Section 8 Housing Administration Funds (EHA), $4,718,800

HUD Section 8 Housing Assistance Funds (EHA), $61,231,355

HUD Section 8 Housing Administration Funds (HASCO), $5,000,000

HUD Section 8 Housing Assistance Funds (HASCO), $74,818,653

Snohomish County Affordable Housing Trust Fund, $795,850

WA State Combined Homeless Grant, $17,652,630

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

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

Snohomish County General Funds, $184,587

Other federal grant funds, $188,014

Other state and local government funds, $5,516,178, and

Private funds and other donations, $1,726,654.

AP-20 Annual Goals and Objectives

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	Rental Housing	2025	2029	Affordable Housing		Affordable Housing	HOME: $1,270,185.74	Rental units constructed: 3 Household Housing Unit
2	Tenant Based Rental Assistance	2025	2029	Affordable Housing		Affordable Housing	HOME: $100,000.00	Tenant-based rental assistance / Rapid Rehousing: 85 Households Assisted
3	Homeowner Minor Home Repair	2025	2029	Affordable Housing		Affordable Housing	CDBG: $1,004,054.00	Homeowner Housing Rehabilitated: 300 Household Housing Unit
4	Homeowner Home Rehabilitation	2025	2029	Affordable Housing		Affordable Housing	HOME: $383,429.30	Homeowner Housing Rehabilitated: 5 Household Housing Unit
5	First-Time Homebuyer Assistance	2025	2029	Affordable Housing		Affordable Housing	HOME: $105,487.48	Direct Financial Assistance to Homebuyers: 3 Households Assisted
6	CHDO Operating Support	2025	2029	Affordable Housing		Affordable Housing	HOME: $92,363.00	Other: 1 Other
7	Infrastructure 1	2025	2029	Non-Housing Community Development		Public Improvements and Infrastructure	CDBG: $122,237.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 125 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	CDBG Public Services - Homeless	2025	2029	Public Housing Homeless		Public Services	CDBG: $291,361.00	Public service activities other than Low/Moderate Income Housing Benefit: 454 Persons Assisted
9	CDBG Public Services - Non-Homeless Special Needs	2025	2029	Non-Homeless Special Needs		Public Services	CDBG: $195,162.00	Public service activities other than Low/Moderate Income Housing Benefit: 813 Persons Assisted
10	CDBG Public Services - Fair Housing	2025	2029	Non-Homeless Special Needs		Public Services	CDBG: $28,375.00	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
11	ESG Homeless Emergency Shelter	2025	2029	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: $104,117.00	Overnight/Emergency Shelter/Transitional Housing Beds added: 390 Beds
12	ESG Homeless Rapid Rehousing	2025	2029	Affordable Housing		Public Services	ESG: $134,579.00	Tenant-based rental assistance / Rapid Rehousing: 25 Households Assisted
13	Grant Planning and Administration	2025	2029	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development			CDBG: $686,530.00 HOME: $184,727.00 ESG: $21,816.00	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Homeless Management Information System	2025	2029	Homeless		Homeless Shelter, Rapid Rehousing, and HMIS	ESG: $30,372.00	Other: 1 Other
15	Public Facilities 4	2025	2029	Non-Housing Community Development		Public Facilities	CDBG: $1,104,940.00	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 63,100 Persons Assisted

Table 3 – 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**	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.

9	**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.
10	**Goal Name**	CDBG Public Services - Fair Housing
	Goal Description	Provide fair housing education and counseling services to low- and moderate-income persons.
11	**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.
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**	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.
14	**Goal Name**	Homeless Management Information System
	Goal Description	Provide support for Homeless Management Information System costs for required data collection and reporting.

15	**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.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The project descriptions below provide a concise summary of activities that will be undertaken during the upcoming year to address priority needs and goals established in the Strategic Plan of the 2025-2029 Consolidated Plan. It includes a project list, a narrative describing allocation priorities and any obstacles to addressing underserved needs, and project description summaries.

#	Project Name
1	Catholic Community Services - Pregnant and Parenting Housing Program
2	Cocoon Housing - East Shelter
3	Domestic Violence Services of Snohomish County - Domestic Violence Emergency Shelter Advocacy
4	Housing Hope – Homeless Family Services
5	Housing Hope - Homeless Teen & Young Parent Program
6	Snohomish County Legal Services - Legal Assistance for Low-Moderate Income Residents of Snohomish County
7	Senior Services of Snohomish County DBS Homage - Food and Nutrition Services
8	Volunteers of America Western Washington - Fair Housing Education and Counseling Services
9	Volunteers of America Western Washington - Expanding Wraparound Care Support Specialist S. Sno Co
10	ESG Rapid Rehousing, Emergency Shelter, HMIS, and Grant Administration
11	YWCA of Seattle-King-Snohomish County - Pathways to Stability TBRA Program
12	Quilceda Community Services - Quilceda Community Housing Initiative
13	Quilceda Community Services - Willow Place Parking Sidewalk and Frontage Improvements
14	Mukilteo Little League - Ballfield Lighting at Pain Field Community Park
15	Snohomish County Fire District 24 - Emergency Response Command and EMS Apparatus 1
16	Snohomish County Fire District 24 - Emergency Response Command and EMS Apparatus 2
17	Snohomish County Fire District 24 - Rural Fire Tender
18	Housing Hope Properties - CHDO Operating Support Grant
19	HomeSight - Homebuyer Purchase Assistance
20	Parkview Services - Parkview Homeownership Assistance

#	Project Name
21	CDBG Planning & Administration
22	HOME Planning & Administration
23	City of Everett - Community Housing Improvement Program (CHIP)
24	City of Everett – Housing Hope Properties - Rainbow Terrace EUCC
25	Homage Senior Services – Minor Home Repair Program

Table 4 – Project Information

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

The allocation priorities for these activities are consistent with the allocation plan for Snohomish County Consortium CDBG, HOME, and ESG funds as set forth in SP-25 of the Strategic Plan of the 2025-2029 Consolidated Plan. The number of activities that may be undertaken are limited by the amount of CDBG, HOME, and ESG funds available. For information on allocation of City of Everett and City of Marysville CDBG grants funds, see the Participating Grantee CDBG Template for each of those Jurisdictions.

AP-38 Project Summary

Project Summary Information

1	**Project Name**	Catholic Community Services - Pregnant and Parenting Housing Program
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: $90,800
	Description	The project is permanent supportive housing which provides tailored services to homeless households that are pregnant, parenting, or working toward reunification and have a substance use disorder.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 27 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.
2	**Project Name**	Cocoon Housing - East Shelter
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: $59,342

	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	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 100 homeless teens ages 12 to 17.
	Location Description	County-wide: East Shelter 15302 Plainview Pl., Monroe, WA
	Planned Activities	
3	**Project Name**	Domestic Violence Services of Snohomish County - Domestic Violence Emergency Shelter Advocacy
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: $47,919
	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	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 adults with children, who are victims of domestic violence and 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	Approximately 150 adults with children, who are victims of domestic violence and predominately low- and moderate-income (400 persons).
4	**Project Name**	Housing Hope – Homeless Family Services
	Target Area	
	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: $6,372
	Description	The agency will maintain and expand Family Support Services, education and employment, parent-child, mental health services, and supported access to critical community services for homeless households across Snohomish County.
	Target Date	June 30, 2027
	Estimate the number and type of families that will benefit from the proposed activities	125 households annually, 350 total persons.
	Location Description	Agency Office: 2505 Howard Ave., Everett, WA 98201. The totality of the project will include 161 units of Permanent Supportive Housing and Other Permanent Housing across 12 locations.
	Planned Activities	It is anticipated that CDBG funds will be used to pay for a Family Support Coach, Mental Health Therapist, Employment Specialist, Financial Literacy Coach, and a Financial Literacy Coach.
5	**Project Name**	Housing Hope - Homeless Teen & Young Parent Program
	Target Area	

	Goals Supported	CDBG Public Services - Homeless
	Needs Addressed	Public Services
	Funding	CDBG: $84,847
	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	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 18 homeless teens and young adult families (44 people in total).
	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, Employment Specialist, Financial Literacy Coach, and a Family Support Coach.
6	**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	CDBG: $50,000
	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	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	250 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.
7	**Project Name**	Senior Services of Snohomish County DBS Homage - Food and Nutrition Services
	Target Area	
	Goals Supported	CDBG Public Services - Non-Homeless Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: $65,000
	Description	The project will provide home delivered meals for home-bound older adults and adults with disabilities; and freshly prepared hot meals at 11 sites, serving approx. 63 households annually.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	63 elderly persons and severely disabled adults
	Location Description	Agency administrative office: 5026 19th 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 meals program.
8	**Project Name**	Volunteers of America Western Washington - Fair Housing Education and Counseling Services
	Target Area	
	Goals Supported	CDBG Public Services - Non-Homeless Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: $28,375
	Description	The project will provide fair housing education, counseling, and referral services to homeless persons in Snohomish County, 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	6/30/2027
	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 is located 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.
9	**Project Name**	Volunteers of America Western Washington-Expanding Wraparound Care-Support Specialist - S. Sno Co
	Target Area	
	Goals Supported	CDBG Public Services - Non-Homeless Special Needs
	Needs Addressed	Public Services
	Funding	CDBG: $82,243

	Description	A Support Specialist will provide resource navigation, case management, and direct services to low-income residents of south Snohomish County in collaboration with other nonprofits at the Lynnwood Neighborhood Center.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 350 households who are predominately low- and moderate-income (1,050 persons).
	Location Description	Lynnwood Neighborhood Center, 19509 64th Ave. West, Lynnwood, WA 98036
	Planned Activities	The CDBG funds are anticipated to be used to provide staffing costs and related operating and maintenance costs for the program.
10	**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
	Funding	ESG: $290,884
	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	6/30/2027

	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 150 homeless households (390 persons) will be served in emergency shelter facilities operated by Domestic Violence Services of Snohomish County and The Interfaith Association of Northwest Washington. 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 and a confidential location for the domestic violence shelter.
	Planned Activities	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 2026 ESG allocations.
11	**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 demonstrate economic hardship.

	Target Date	6/30/2027
	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.
12	**Project Name**	Quilceda Community Services - Quilceda Community Housing Initiative
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: $1,082,258.74

	Description	The Quilceda Community Housing Initiative (QCHI) proposed project is a new construction 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)The QCHI project unit is planned to house twelve (12) 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. The residential portion area of QCHI is planned to total 8,250 sq. ft between six (6) 1-bedroom, 1-bathroom units and six (6) 2-bedroom, 1-bathroom units that range between 560 - 930 sq. ft. each. The planned 1,474 sq. ft. communal building of QCHI will include on-site property management, workspaces for residential services staff, and recreational space for tenants. This will also include in the communal building a fully accessible hospitality kitchen, large communal space (including usage by QCS for staff training and board meetings), client meeting rooms, large-load laundry facilities and storage. Site improvements planned include 12 parking stalls along with common areas for outdoor dining and gardening.
	Target Date	9/1/2027
	Estimate the number and type of families that will benefit from the proposed activities	The project is planned to house twelve (12) very-low- income individual households with 30% Area-Median-Income (AMI) or below. QCHI's tenants are planned to earn less than 20% of AMI; all tenants of QCHI will be at or under 30% AMI. First preference for the units is planned for people who have intellectual and developmental disabilities referred by Washington State Department of Social and Health Services' (DSHS) Developmental Disabilities Administration (DDA). The agency advised that the referral preferences are required by the Washington State Department of Commerce (Commerce) for Housing Trust Funds (HTF) that is an anticipated set-aside for I/DD housing. The referral agreement with DDA for QCHI gives preference to people with I/DD 90 days from the time notified of a vacancy. After 90 days, preference will be given to non-DDA referrals who have I/DD. If no tenant is found, then the unit will be opened to people with physical or behavioral health disabilities and seniors.

	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 (Parcel 00538500000502), and is combined with a western portion of the neighboring property of 17,000 sq. feet (Parcel 00538500000501) purchased in December 2023. The subject site is in a high-density residential neighborhood, two blocks from the nearest bus stop, and 0.6 miles from State Street in the City of Marysville.
	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 two (2) units.
13	**Project Name**	Quilceda Community Services - Willow Place Parking, Sidewalk, and Frontage Improvements
	Target Area	
	Goals Supported	Infrastructure 1
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: $122,237
	Description	Quilceda Community Services (QCS) is requesting CDBG Funds for construction costs to install curb, gutter, sidewalk, and street trees along QCS property frontage and to reconstruct the existing Willow Place Recreation Respite program parking lot with porous asphalt, ADA-Compliant spaces, and designated paratransit drop-off areas.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	125 persons who are presumed by HUD to be low-and moderate-income under Limited clientele Presumed Benefit to severely disabled adults.
	Location Description	9610 48th Drive NE Marysville WA 98270.
	Planned Activities	See project description above.

14	**Project Name**	Mukilteo Little League - Ballfield Lighting at Pain Field Community Park
	Target Area	
	Goals Supported	Public Facilities 4
	Needs Addressed	Public Facilities
	Funding	CDBG: $135,059.76
	Description	Mukilteo Little League (League) is requesting CDBG funds for the purchase and installation of energy-efficient ballfield lighting systems, including poles, fixtures, wiring, and professional installation. The proposed project will add lighting to the softball field with a plan to upgrade the existing lighting on the baseball field to current standards and energy efficiency with the softball lighting being the priority. The project encompasses two existing Little League ballfields, each with 60-foot base paths and 200-foot outfield fences. Each field measures approximately 1 acre (43,560 sq ft), for a combined project area of about 87,120 sq ft. Functionally, the project includes the installation of new ballfield lighting systems across both fields, covering the entire playing surface and foul territory. Geographically, the lighting installation is integrated with existing infrastructure, including dugouts, bleachers, scoreboards, and pedestrian pathways. While the CDBG funds will specifically support the acquisition and installation of the lighting systems, the project footprint also encompasses related facilities such as spectator seating, and access routes, which are essential to the safe and effective use of the fields.
	Target Date	1/1/2027
	Estimate the number and type of families that will benefit from the proposed activities	52,600 Area wide benefit park serves Everett and Mukilteo.
	Location Description	11928 Beverly Park RD Everett WA 98204.
	Planned Activities	See project description above.
	Project Name	Snohomish County Fire District 24 - Emergency Response Command and EMS Apparatus 1

15	**Target Area**	
	Goals Supported	Public Facilities 4
	Needs Addressed	Public Facilities
	Funding	CDBG: $108,500
	Description	Snohomish County Fire District 24 (District) is requesting CDBG funds for the acquisition of a new Command and EMS apparatus that was totaled after it was involved in a motor vehicle accident while returning from an incident call.
	Target Date	2/28/2027
	Estimate the number and type of families that will benefit from the proposed activities	3,500 people. The Service area includes portions of Census Tract 53700, Block Groups 1&2 and Census Tract 53506, Block Group 1, where 62.55% of the population is Low- and moderate-income.
	Location Description	1115 Seeman Street Darrington WA 98241.
	Planned Activities	See project description above.
16	**Project Name**	Snohomish County Fire District 24 - Emergency Response Command and EMS Apparatus 2
	Target Area	
	Goals Supported	Public Facilities 4
	Needs Addressed	Public Facilities
	Funding	CDBG: $108,500
	Description	Snohomish County Fire District 24 is requesting CDBG Funds for the acquisition of a new Command and EMS Apparatus to replace their current 15-year-old vehicle which has reached the end of its useful life.
	Target Date	2/28/2027

	Estimate the number and type of families that will benefit from the proposed activities	3,500 persons. The Service area includes portions of Census Tract 53700 Block Groups 1&2 and Census Tract 53506, Group 1 Where 62.55% of the population is LMI.
	Location Description	1115 Seeman Street Darrington WA 98241.
	Planned Activities	See project description above.
17	**Project Name**	Snohomish County Fire District 24 - Rural Fire Tender
	Target Area	
	Goals Supported	Public Facilities 4
	Needs Addressed	Public Facilities
	Funding	CDBG: $752,880.24
	Description	Snohomish County Fire District 24 requests CDBG Funds for the acquisition of a new Rural Fire Tender with a 3000 - 4000-gallon tank, equipment compartments, and hose storage. If awarded, this Fire Tender will replace the districts aging and failing 33-year-old current Fire Tender which is at the end of its useful life.
	Target Date	2/28/2027
	Estimate the number and type of families that will benefit from the proposed activities	3, 500 people will benefit. The Service area includes portions of Census Tract 53700 Block Groups 1&2 and Census Tract 53506, Group 1 Where 62.55% of the population is LMI.
	Location Description	1115 Seeman Street Darrington WA 98241.
	Planned Activities	See project description above.
18	**Project Name**	Housing Hope Properties - CHDO Operating Support Grant

	Target Area	
	Goals Supported	CHDO Operating Support
	Needs Addressed	Affordable Housing
	Funding	HOME: $92,363
	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	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable.
	Location Description	Administrative Office is located at 5830 Evergreen Way, Everett, WA 98203.
	Planned Activities	See project description above.
19	**Project Name**	HomeSight - Homebuyer Purchase Assistance
	Target Area	
	Goals Supported	First-Time Homebuyer Assistance
	Needs Addressed	Affordable Housing
	Funding	HOME: $104,728.66

	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 $104,728.66 in actual PY 2025 HOME program income as of February 28, 2026. Any additional HOME PI collected through the end of the 2025 PY (June 30, 2026), will be allocated to this activity, contingency upon receipt.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	3 households 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.
20	**Project Name**	Parkview Services-Parkview Homeownership Assistance
	Target Area	
	Goals Supported	First-Time Homebuyer Assistance

	Needs Addressed	Affordable Housing
	Funding	HOME: $758.82
	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 $508.79 in PY 2025 HOME program income. Any additional HOME PI collected through the end of 2025 PY (June 30, 2026) will be allocated to this activity contingency upon receipt.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	One household with income at or below 80% of the area median income.
	Location Description	Scattered sites county-wide outside the King County portion of Bothell. Administrative office is located at 920 N Argonne Road, Suite 308, Spokane Valley, WA 99212. Office: 509-861-3330, Toll free: 877-541-9846
	Planned Activities	See project description above.
21	**Project Name**	CDBG Planning & Administration
	Target Area	

	Goals Supported	Grant Planning and Administration
	Needs Addressed	Grant Planning and Administration
	Funding	CDBG: $686,530
	Description	Funds will be used by Snohomish County to provide general management, oversight, and coordination of the CDBG grant program.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	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 the 2026 CDBG allocation and PY 2025 CDBG program income. An additional allocation of 20% of any PY 2026 CDBG program income remitted to the County in excess of the estimated amount is also allocated to this activity, contingent upon receipt.
22	**Project Name**	HOME Planning & Administration
	Target Area	
	Goals Supported	Grant Planning and Administration
	Needs Addressed	Grant Planning and Administration
	Funding	HOME: $184,727

	Description	Funds will be used by Snohomish County to provide general management, oversight, and coordination of the HOME grant program.
	Target Date	6/30/2027
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	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 2026 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.
23	**Project Name**	City of Everett – Community Housing Improvement Program (CHIP)
	Target Area	
	Goals Supported	Homeowner Home Repair/Rehabilitation
	Needs Addressed	Affordable Housing
	Funding	HOME: $383,429.30

	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 2025 program year is also allocated to this activity, contingent upon receipt.
	Target Date	December 31, 2027
	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	Administrative Office Location: Everett Municipal Building, 2930 Wetmore Avenue, Suite 8B, Everett, WA 98201. Project location: 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.
24	**Project Name**	City of Everett – Housing Hope Properties - EUCC Rainbow Terrace
	Target Area	
	Goals Supported	Rental Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: $187,927

	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	December 31, 2028
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 1 HOME unit for low-income seniors aged 55 and above.
	Location Description	2624 Rockefeller Ave, Everett, WA 98201
	Planned Activities	Construction Costs
25	**Project Name**	Homage Senior Services – Minor Home Repair Program
	Target Area	
	Goals Supported	Homeowner Minor Home Repair
	Needs Addressed	Affordable Housing
	Funding	CDBG: $1,004,054
	Description	Homage Senior Services (Homage) will use CDBG funds to provide health, accessibility, and safety repairs to 300 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, Marysville, and the King County portion of the City of Bothell. Snohomish County will use a portion of the funds allocated to this activity for activity delivery costs.
	Target Date	June 30, 2027

	Estimate the number and type of families that will benefit from the proposed activities	300
	Location Description	Administrative offices are located at 1715 100th Pl SE, Everett, WA 98208. 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.

AP-50 Geographic Distribution - 91.420, 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The projects recommended for funding in the 2026 Annual Action Plan with Snohomish County Consortium CDBG, HOME, ESG and HOME 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, serves households Consortium-wide.
- Two programs provide homeownership assistance to first-time low-and moderate-income homebuyers and serves households Consortium-wide.
- A program providing homeowner home rehabilitation will serve households in Everett and the Everett Urban Growth Area.
- One infrastructure improvement project is located in Marysville.
- Three public facility projects are located in Darrington and one public facility project is located in Mukilteo.
- Public services, rapid rehousing, and emergency shelter projects generally serve people Consortium-wide.
- Development of two new affordable rental housing projects located in the City of Marysville and in the City of Everett.

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 country, 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 48.40% 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.

Affordable Housing

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 2026 program year. Activities include homeowner home repair and rehabilitation, first-time homebuyer purchase assistance, rapid re-housing rental assistance, Tenant Based Rental Assistance, and construction of new affordable housing.

One Year Goals for the Number of Households to be Supported	
Homeless	110
Non-Homeless	8
Special-Needs	304
Total	422

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	110
The Production of New Units	3
Rehab of Existing Units	305
Acquisition of Existing Units	4
Total	422

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

For the 2026 Annual Action Plan, it is estimated that Snohomish County Consortium 2026 CDBG, HOME, and ESG projects will provide affordable housing to 110 renter households and 309 homebuyer and homeowner households. Of the 110 renter households, it is estimated that 100 will be extremely low-income and 10 will be low income. Of the 309 homebuyers and homeowner households, it is estimated that 192 will be extremely low-income, 113 will be low-income, and 4 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, and both housing authorities own other units of assisted and affordable housing 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 public and assisted housing and to encourage public and 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 Q2 of 2024 and continue administering the rent study, with 2026 beginning the first year of triennial reviews for those in the tiered rent group. The rent study tests a new tier-based rent setting model that rewards employment and streamlines program administration.

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

1. Plan for the recapitalization of the Broadway Plaza, a 191-unit affordable housing development located in downtown Everett serving low-income seniors and people with disabilities. The recapitalization of the property will include new ownership structuring, debt refinancing, and rehabilitation of the property to address capital needs.
2. Continue seeking funding sources for the hazardous materials abatement and demolition of remaining units in the Baker Heights neighborhood. 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.
3. Continue to pursue financing, design, and permitting for Benjamin Young Senior Apartments, a new Transit-Oriented Development for seniors located in the Port Gardner neighborhood of Everett one block from bus rapid transit and within close proximity to many services within the immediate neighborhood. There will be 91 residential units and exterior amenity space. In the program year, EHA expects to enter into an Agreement to Enter into a Housing Assistance Payments Contract (AHAP) for a portion of the units with Project Based Vouchers designated for low-income seniors.
4. Continue to partner with Sno-Isle Libraries on a joint mixed-use development in the Mariner

community. EHA and Sno-Isle Libraries have acquired adjacent sites near the future 128th St SW Light Rail station and are collaborating on development plans for a mixed use, Transit-Oriented Development (TOD) project including a new Sno-Isle library branch, community space, and affordable housing units subsidized with Project-Based Vouchers.

5. Over the course of the program year 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 households with children and elderly households and individuals.
6. 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 households, 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

Housing Authority of Snohomish County (HASCO):

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.
7. HASCO continues to explore options to purchase and/or develop additional affordable housing in Snohomish County by working with third parties to innovate and find creative ways to expand housing options to ensure additional housing can be achieved across the continuum.

Everett Housing Authority (EHA):
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 agency website, distribution of newsletters, and posts to the agency Facebook page.
4. Continue to maintain an active caseload of Family Self-Sufficiency program participants, and expand that program to allow more participation and opportunity.
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

Neither of the two Public Housing Authorities in Snohomish County are considered troubled.

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 repeated 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 include:

- 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.
- The SHSP does outreach to seniors age 60 and above who are experiencing housing instability or homelessness.

All unsheltered individuals and families are first assessed using Coordinated Entry (CE) tools and processes. Individuals and families are then connected directly to Coordinated Entry 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 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 by fostering collaborative partnerships that include mainstream employment services providers.

There are 549 total year-round beds of emergency shelter and transitional housing reported in the 2025 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 shelters and services for households experiencing domestic violence. Shelter providers have

identified permanent housing as the appropriate intervention for most homeless households. Individuals and families applying to shelter are enrolled in the Coordinated Entry system so that they can be considered for permanent housing options as quickly as possible. There were 3,025 year-round beds of permanent housing available in 2025, including 1,550 permanent supportive housing beds, 735 rapid rehousing beds, and 740 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° or below in their local jurisdiction. There are cold weather shelters in Lynnwood, Marysville, Monroe, Snohomish and three locations in 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. The County is working with the shelter providers to convert to an emergency weather shelter model, with the ability to activate for extreme heat, smoke, and other extreme weather conditions. For example, the shelter providers activated during the December 2025 flood events even though the forecast was above 34°.

In 2022, Snohomish 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 in 2026, after renovations and refurbishing were completed. The sites are in two different areas of the county and will provide a range of supportive services in a structured environment, tailored to individuals who are dedicated to securing stable housing, 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 Models. 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 Coordinated Entry Navigators in the Coordinated Entry system and some local shelters to meet the needs of homeless households. These funds allow 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.

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 whom they serve.

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.

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 2026 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.

One of the action items in the HART report was the need to find additional resources to build more affordable housing. On December 15, 2021, the Snohomish County Council authorized the authority granted in HB 1590, to increase the stock of affordable housing in Snohomish County. Collection of the 0.1 percent ($0.01 per $10 purchase) started in April of 2022. Executive Somers intends to coordinate any spending on affordable housing with HART to ensure these resources have truly regional and equitable impact.

Any proposed spending on affordable housing, shelter, and behavioral health projects resulting from this authorization will be coordinated with cities and towns, as well as two established bodies: the Snohomish County Housing and Community Development Technical Advisory Committee (TAC) and the

Policy Advisory Board (PAB). These bodies have representatives from impacted communities, cities, towns, and housing experts.

Snohomish County and Consortium members will also continue to allocate local funds under the Snohomish County Affordable Housing Trust Fund to help with affordable housing needs, allocate a portion of local funds generated under a sales tax program to help with affordable housing needs for persons with mental health and substance abuse challenges, continue the contingent loan policy under which $40 million in loan guarantees can be provided to non-profit organizations and housing authorities to support affordable housing projects, and continue administration of programs that provide reduced property taxes for property owners with limited incomes.

The County has continued to allocate additional capital resources from other local County sources, including funds from the Chemical Dependency Mental Health Sales Tax Fund ("CDMH") to support projects which include units for individuals who have a chemical dependency, mental health, and/or co-occurring disorders, where housing is a component of a coordinated chemical dependency or mental health treatment program. These funds have helped support the financing and development of new affordable housing units.

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 greatest obstacle to meeting underserved needs is the gap between the limited funding available and the growing number of people in the community with unmet or underserved needs. The gap has only continued to widen in the face of sustained funding cuts in multiple federal, state, and local sources of funding.

Snohomish County Human Services Department continues to provide local funding to help address the affordable housing needs of the County's homeless and low-income residents through its Affordable Housing Trust Fund program and Sales Tax programs as well as awards of State passthrough funding to address homelessness and housing instability. The County also continues to pursue additional funding opportunities to more fully meet community needs.

The Human Services Department continues to lead or participate in various collaborative efforts and partnerships developed to help address underserved needs in the community and minimize duplication of services for low-income persons, homeless persons, and persons with special needs, such as the Partnership to End Homelessness, the governing board for the Continuum of Care program, a multi-sector group of agencies and community members focused on preventing and ending homelessness.

In the wake of the pandemic and due to other local factors such as the high cost of living, local homeless housing agencies continue to struggle with staff turnover and slower hiring for open positions within their programs, impacting their capacity to serve as many clients as would be possible under full staffing. The County's Office of Community and Homeless Services (OCHS) staff closely monitors subrecipient expenditures, utilization of available housing, and project performance. OCHS staff provides ongoing technical assistance to subrecipient agencies to support them in maximizing use of funds and project performance.

Actions planned to foster and maintain affordable housing

The Snohomish County Consortium has awarded CDBG and HOME funds in the Draft 2026 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.

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

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.

Snohomish County is continuing to enhance its comprehensive and effective workforce system under the direction of the Snohomish County Executive and the local workforce development board appointed by the Executive. 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.

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 construction projects and activities in their neighborhoods to the greatest extent possible.

The Snohomish County Human Services Department will continue the various activities outlined in the

Strategic Plan of the 2025-2029 Consolidated Plan, Section SP-70.

Actions planned to develop institutional structure

The Snohomish County Consortium continues to benefit from a strong institutional structure and the existence of a broad range of project sponsors for affordable housing and non-housing community development projects (public facilities, infrastructure improvements, public services). The Consortium's work to maintain this structure is informed by 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 many collaborative partnerships. Key partners in the community include local governments and other public agencies, including the city and county housing authorities; the Partnership to End Homelessness; private non-profit organizations; and faith-based organizations.

In 2020, Snohomish County Executive Dave Somers brought together elected leaders across the county to form the Snohomish County Housing Affordability Regional Taskforce (HART), under the belief that the community's continuing housing affordability challenge is best addressed collaboratively and proactively. The Taskforce's work resulted in a Report and Five-Year Action Plan, and the work of the HART group continues to influence affordable housing policy decisions across the county to this day.

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, facilitated in part by the Landlord Engagement Program, which is funded by the County and operated by a local non-profit agency, with the goal of expanding rental housing access for tenants with challenging rental histories and other barriers to housing,
- Continued award of federal and local funds to local non-profit agencies to provide fair housing training, education, and support to renters and landlords, and legal assistance to low-income renters,
- Continued incentivization for housing and service providers to coordinate with one another, through the County's affordable housing application process,
- Continued refinement of the Coordinated Entry system and processes to ensure that the system equitably and efficiently connects eligible individuals and families experiencing homelessness to available housing resources,
- Continued focus on connecting participants in housing and services programs with mainstream employment services to help them increase their income and further stretch limited community

resources to serve more people, and

- 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 2026 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 2026, 2027, and 2028 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 2026 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 2026 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," which is found in **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 2026 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.

Emergency Solutions Grant (ESG)

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 has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Agencies receiving ESG funding from Snohomish County must participate in the Coordinated Entry (CE) system. CE connects people who are homeless or at-risk of homelessness with homelessness prevention resources, housing assistance, 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, the Continuum of Care (CoC) governing board. Prioritization is based on the length of time an individual or family has experienced homelessness *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, stable housing is viewed as the first step in addressing challenges and provides individuals and families with a foundation on which they are then able to address barriers to ongoing housing stability and meet their full potential. 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 element of a Housing First approach. 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.

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.

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. 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).

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, which is comprised of community members and elected officials, 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 Partnership to End Homelessness CoC Board has six (6) 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 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 expertise of homelessness and typically has multiple members who have lived expertise.

   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 of people experiencing homelessness 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.**

   Snohomish County staff developed initial ESG and CoC performance standards as part of the process of complying with the new ESG and CoC Interim Rules in consultation with ESG and CoC subrecipient agencies. The performance standards are intended to decrease the length of time that people spend homeless and in emergency shelters, increase the rate of people remaining in or exiting to permanent housing, and increase household income.

   The Data and Analysis Committee of the Partnership to End Homelessness CoC Board regularly reviews and develops recommended updates to system performance standards by project type and population. Updated standards are adopted by the Partnership to End Homelessness Board and individual projects are monitored for performance against the standards by County staff as part of their ongoing monitoring activities.

APPENDIX 1 to AP-12: 2026 Annual Action Plan
Public Comments
Public Hearing on January 14, 2026 and April 9, 2026
Public Review and Comment Period on Draft 2026 Annual Action Plan
March 26, 2026, through May 11, 2026

Resident Comment	County Response
Andrea Wyatt: Up here in Stanwood, we have a small fund from sales tax to help with housing assistance for clients who reside only within the City of Stanwood limits. The vast majority of clients who we see live outside of the city limits, in unincorporated areas of Snohomish County. We would like to have some kind of assistance program through the county using the same sales tax model that the city currently provides. Is this possible? Also – there is a lack of affordable housing in the Stanwood area. We would like for Snohomish County to provide support and focus for an expansion of affordable housing in this area. The number one client request for assistance is in finding affordable housing in Stanwood, and there simply are not enough current units.	The Consortium thanks Andrea for the comments. This request for public comments was specifically for the draft 2026 Annual Action Plan and how the federal funds are proposed to be used to fund Snohomish County projects that primarily benefit low- and moderate-income households. For questions about Sales Tax proposals, please reach out to the City of Stanwood's Sales Tax administrator to determine the process for proposals. The federal funding under this notice is received by the 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, including Stanwood. The partnership is established through an Interlocal Agreement and allows the Consortium, as an Urban County, to receive approximately $5.5 million dollars in federal funding each year as formula grants under three grant programs: 1. Community Development Block Grant (CDBG), 2. HOME Investment Partnerships Program (HOME), and

	3. Emergency Solutions Grant (ESG). The United States Department of Housing and Urban Development (HUD) awards annual grants to entitlement communities to develop viable urban communities by providing decent housing, a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. In order to receive these funds, the Consortium is required to develop a Five-year Consolidated Plan to guide investment on an annual basis, which is implemented through five one-year annual action plans. Funding is made available under a Notice of Funding Opportunity (NOFO) which is published each year and invites non-profit agencies, cities and towns, housing developers, housing authorities, and other government agencies to apply for funding to develop affordable housing projects in Snohomish County, independently or in partnership with other entities. A recommended proposal/partnership for units in Stanwood could be eligible for funding under a future NOFO. The County appreciates the input provided by Andrea and looks forward to continued partnership and collaboration with the City of Stanwood to increase local affordable housing options. Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.
Family Enrichment in Rural Neighborhoods (FERN)	We appreciate the comments provided by community members. The funding allocated in the 2026 Annual Action

As community members in Darrington, WA, we are writing to provide comment on the current public facilities and services, or lack thereof, in Darrington as you begin to finalize the 2026 Action Plan for Snohomish County. We appreciate the opportunity to provide feedback and discuss the areas in which our county can provide support for us in Darrington as we attempt to both stimulate the economy and job market and create a more robust public support system. In 2020 Darrington lost its only childcare facility, Kid's Place, which was founded in 1991 by a group of moms that worked together at the Darrington Ranger District office for the USDA Forest Service. They formed a nonprofit that was able to source and route grant funding (primarily HUD block grants) that they used to first upgrade a local church, then a Forest Service facility, and eventually build a new childcare facility from the ground up - a feat that took several years to complete. Later on, the administration of Kids Place was taken over by North Counties, still in the same building. That building is now being used by the Darrington School District (DSD) for Transition Kindergarten and ECAP. The need for both early education/childcare and the jobs that a childcare facility would create have not changed, but using lessons learned from our predecessors (all of which are either still employed at the Forest Service or are involved community members) and advice from the Center for Retention and Expansion of Childcare Centers (CRECC), we identified the necessity for private subsidization and investment from the employers in town. The largest employer in Darrington is the Sauk-Suiattle tribe, and the second largest is Hampton Lumber. Sauk-Suiattle has their own childcare facility (ECAP), but Hampton does not. After having preliminary discussions with administrative staff at Hampton's	Plan includes CDBG, HOME, and ESG funds. The funding is made available through a Notice of Funding Opportunity (NOFO), and applications for funding are generally available in the summer/fall of each year. Non-profit agencies, housing developers, housing authorities, cities and towns, and other government agencies may apply for funding for various types of projects that must predominately benefit low- and moderate-income persons throughout Snohomish County. The goals and priorities identified in the 2025 - 2029 Consolidated Plan and through each year's annual action plan, are based on the highest priorities identified through the planning process. The current 2025-2029 Consolidated Plan includes goals for public facility and infrastructure projects which could include childcare centers and/or early learning centers that benefit low- and moderate-income households. Cities, Towns, non-profit agencies and other governmental agencies are invited to apply for funding. The application process is competitive. Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.

Darrington mill office, there is interest in the formation of a childcare center, and they are willing to discuss private subsidizing. When talking to CRECC last year about this project, they had already run out of funding for Snohomish County and were only able to offer over the phone consultation, which can only take us so far. We recognize that there are many conversations still to be had, but there is a clear need for childcare and local employment. Both the Sauk-Suiattle and the DSD ECAP have a waitlist and are typically over capacity, and there are consistent posts on the local social pages of qualified childcare providers looking for work. Other contextual factors that could promote or inhibit childcare interest and ability include, but are not limited to affordable housing and median income. Notwithstanding, we are dedicated to the task at hand and invested in seeking subsidized childcare for ourselves and this community. There are facilities in town we have looked into already, and models in other towns that we intend to learn from and potentially replicate. We are advocating for monetary or administrative investment from the county to make this process less taxing for our involved community members. All but one of us are employed part or full-time on top of raising young children (position and employer listed with our signatures) 5 years of age or younger. We are in need of support in this endeavor. Again, thank you for the opportunity to provide comments and request support and funding for these projects so near to our hearts and the hearts of our community. Regardless of the hurdles, we will pursue the completion of this project, but it would be a smoother road if we have the financial and administrative support of the county. There is a Department of Commerce grant that we plan to apply for, but additional funding and resources would be welcome with open arms.	

Camden Bruner: I am writing to encourage Snohomish County to include funding for the development of a daycare facility in Darrington, WA in the 2026 Consortium Action Plan. My name is Camden Bruner and I am the District Ranger for the Mt. Baker-Snoqualmie National Forest, Darrington Ranger District. The Darrington Ranger District currently has 35 employees with additional seasonal summer hires planned. This includes a cadre of wildland firefighters, a law enforcement officer, foresters, recreation staff and other personal important for public safety and supporting the local economy. A key challenge for current employees and for the recruitment of future employees is the fact that Darrington lacks daycare opportunities. I have heard from my staff the hardship of lacking such a facility is for their families and believe this is a key issue for long-term employee retention. I have also heard from potential employees that the lack of childcare makes the prospect of joining our team in Darrington untenable. I believe lacking a daycare hinders our ability to recruit and retain top tier talent. My understanding is that a group of local mother's plan to work with a nonprofit, Family Enrichment in Rural Neighborhoods, to start a new childcare facility in Darrington. They will need support to get the project off the ground. I would encourage Snohomish County to consider funding for childcare and early learning for rural communities in their 2026 Consortium Action Plan.	The County thanks Camden for the comments. The funding allocated in the 2026 Annual Action Plan includes CDBG, HOME, and ESG funds. The funding is made available through a Notice of Funding Opportunity (NOFO), and applications for funding are generally available in the summer/fall of each year. Non-profit agencies, housing developers, housing authorities, cities and towns, and other government agencies may apply for funding for various types of projects that must predominately benefit low- and moderate-income persons throughout Snohomish County. The goals and priorities identified in the 2025 - 2029 Consolidated Plan and through each year's annual action plan, are based on the highest priorities identified through the planning process. The current 2025-2029 Consolidated Plan includes goals for public facility and infrastructure projects which could include childcare centers and/or early learning centers that benefit low- and moderate-income households. Cities, Towns, non-profit agencies and other governmental agencies are invited to apply for funding. The application process is competitive. Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.
As Darrington, WA community members, we are writing to provide comment on the current deficiencies of our public facilities in Darrington as the 2026 Action Plan is finalized for Snohomish County. We appreciate the opportunity to provide feedback and discuss the areas in	The County thanks the Town of Darrington community members for their comments. The funding allocated in the 2026 Annual Action Plan includes CDBG, HOME, and ESG funds. The funding is

which our county can support us as we attempt to create a strong public support system for youth and families in Darrington. The Old School Park is Darrington's only community park. Located in the center of town, it is heavily used as a common gathering place for community members. During the summer months, it is a natural communal place for tourists and travelers on both Highway 20 and Mountain Loop Highway. Unfortunately, our playground does reflect the civic cornerstone that Old School Park is and has been for generations. With original play equipment installed in the late 90's, it is severely outdated, and unlike neighboring communities, does not have a splash pad. There is a clear need for youth play space. While families and youth frequently gather at Old School Park now, they are consistently let down by the lack of play equipment. The swing set is inundated with puddles that inhibit use in most weather, the constant decomposing wood chips give way to large pieces of black landscaping cloth, and broken spring rider handles and graffitied metal climbers make the playground and, indirectly, our youth, seem like a neglected priority. While surrounding communities (both nearest communities are at least a 30 minute drive away) have updated parks and splash pads, Darrington's only playground remains well below common standards. We lack ADA accessibility, limiting equal access to community members and tourists, and most Darrington residents do not have the means to access neighboring parks given the significant commute. Travelers coming through Darrington have the opportunity to stop, support local businesses, use covered restroom facilities, and enjoy our scenic town. Upsettingly, our lack of youth amenities like an accessible playground or splash pad (especially during the summer months, which are set to only get hotter and drier) may prevent Darrington from being worth the stop for families. Community Old School Park events like park fairs, Library in	made available through a Notice of Funding Opportunity (NOFO), and applications for funding are generally available in the summer/fall of each year. Non-profit agencies, housing developers, housing authorities, cities and towns, and other government agencies may apply for funding for various types of projects that must predominately benefit low- and moderate-income persons throughout Snohomish County. The goals and priorities identified in the 2025 - 2029 Consolidated Plan and through each year's annual action plan, are based on the highest priorities identified through the planning process. The current 2025-2029 Consolidated Plan includes goals for public facilities and infrastructure projects that benefit low- and moderate-income neighborhoods, and includes ADA accessibility improvements. Applications for funding are published each year and Cities and Towns are encouraged to submit applications for funding. Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.

the Park, parades, fundraisers, and more would benefit from the draw of a modernized play space. Our community sees Old School Park as lacking compared to others and has voiced a strong desire for a splash pad similar to our bordering communities. We are currently invested in updating this park as soon as possible. Play is a fundamental aspect of childhood development. As young parents in this community, we believe that our children deserve access to developmental play as much as other communities' youth. A safe public space geared towards families with young kids will only strengthen the community from within, providing a safe space for our children to exercise and socialize. After years of hearing community members asking for the modernization of Old School Park and now feeling the lack of play space for our own children, we feel this update is long overdue. We are at the stage of gathering community input and attending town council meetings to plan logistics, but wanted to ensure that our needs are known during the county's process of gathering infrastructure priorities. In these early stages of updating our park, the financial and administrative support of the county would be pivotal. Again, we appreciate the opportunity to comment on the concerns of our community and our current needs for community development. Sincerely, Family Enrichment in Rural Neighborhoods (FERN) Maia Walston, Coordinator, Darrington Collaborative; Owner, Lonely Mountain Bakery Natalie Coria - Library Associate, Darrington Sno-Isle Libraries Victoria Fernanda De Luna Ramirez - Dental Surgeon, Odontologia Bioestética Nora Towner - Owner, One Woman Massage Abigail Hollifield - Nonprofit Finance Administrator	

Kathy Powers, Orion: I am the Vice President of Services at Orion – a grant recipient under the Employment Support Services Program. This program has had an enormous impact on our local community. In just 2025, Orion supported 87 unduplicated residents and supported 31 individuals into employment with an average wage of $21.32. We supported 12 in our transitional training program in manufacturing. Our total annual revenue for this program was under $100,000. All individuals supported experienced multiple barriers. This included barriers such as low income, housing instability, unhoused, addiction, justice involvement, English language learners, immigrant / refugee status and disability. Our contract was supported through recovery dollars and will sunset June 30, 2026. While Orion has searched for additional funding, none has been secured and this program will be eliminated on June 30th with no ongoing funding to support it. This grant offered an amazing opportunity to fund services that met individuals where they were at regardless. In digging into the impact, we identified critical outcomes of: Gaining Employment, Managing Barriers, Gaining Self Esteem and Linking with Systems of Support. Individuals supported through this program are many times not engaged in systems of support. Meeting participants in the community who provides support and system navigation with the goal of employment has had a huge impact on the community. A Summary of our Employment Readiness Project: The ERSS project design is grounded in nationally recognized best practices for increasing economic stability among individuals	The County acknowledges the need for funding employment programs and thanks Kathy for the comment. The goals and objectives for funding in the 2026 Annual Action Plan were developed in the 2025-2029 Consolidated Plan planning process. CDBG funding allocated for public services is limited to 15% of the CDBG grant per year and is generally around $500,000. The CDBG goals for public services in the 2025-2029 Consolidated Plan include: 1. **CDBG Public Services Non-Homeless Special Needs:** 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. 2. **CDBG Public Services – Homeless:** Provide services for persons experiencing homelessness or at-risk of becoming homeless, including individuals, families, unaccompanied youth, and/or persons with special needs. 3. **CDBG Public Services - Fair Housing:** Provide fair housing education and counseling services to low- and moderate-income persons.

experiencing homelessness or severe income insecurity. Research from the National Alliance to End Homelessness (NAEH) identifies increasing earned income, reducing practical barriers, and integrating employment supports into homelessness-response systems as core strategies for preventing homelessness and promoting long-term stability (NAEH, “Employment and Income Supports”). The U.S. Interagency Council on Homelessness (USICH) likewise emphasizes individualized case management, early engagement, and low-barrier access to employment pathways as essential components of effective service models. ERSS aligns closely with these evidence-based recommendations by providing personalized case management, rapid barrier reduction, and flexible support that meets clients where they are. The program’s model also reflects core principles from evidence-based supported employment frameworks such as the Individual Placement and Support (IPS) model, including rapid engagement, integrated partner collaboration, and ongoing retention assistance. These approaches are widely demonstrated to improve employment outcomes for individuals with disabilities, behavioral health challenges, and significant systemic barriers. Local results further validate the model. In the most recent program year, ERSS exceeded county performance targets for both employment placement and barrier resolution, demonstrating the effectiveness of providing stabilization support alongside job readiness and employment services. The program consistently reaches individuals who cannot access traditional workforce systems due to homelessness, lack of documentation, transportation barriers, untreated mental health needs, inconsistent phone access, or other vulnerabilities. I would ask the County continue to focus on programs with an employment focus. While it is mentioned in the Plan, it is not listed as a	Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.

priority. For many, stable employment is the key to navigating housing instability!	
Lauren Pease, Housing Hope: Continuing funding for support programs that provide employment, job training, and education services is critical. These services are not supplemental but are foundational in alleviating poverty and helping low-income individuals and families achieve long-term stability. For many low-income individuals, systemic barriers such as housing instability, limited access to affordable transportation or childcare, language barriers, and limited education or employment experience make it more difficult to move forward without targeted support. Services like those offered through Housing Hope's Employment, Education, & Training program address these barriers directly by aiding people in securing employment or education and sustaining it over time. The CDBG-CV3 funds enabled Housing Hope to provide job readiness, career advancement, educational guidance, and ongoing support. Housing Hope's programming empowers people to increase their earning potential, build financial security, and break the generational cycle of poverty. Without a replacement funding source, there is a risk of leaving people stuck in cycles of instability rather than giving them the tools to build lasting independence. As a result of these funds, Housing Hope and its participants were able to achieve the following: In Calendar Year 2025, 35 individuals were successfully employed and earned an average wage of $24.45 an hour. Housing Hope has worked with 75 different local employers to hire participants that completed the agency's Job Training program. Housing	The county appreciates the comments provided by Lauren. The goals and objectives for funding in the 2026 Annual Action Plan were developed in the 2025-2029 Consolidated Plan planning process. CDBG funding allocated for public services is limited to 15% of the CDBG grant per year and is generally around $500,000. The CDBG goals for public services in the 2025-2029 Consolidated Plan include: 4. **CDBG Public Services Non-Homeless Special Needs:** 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. 5. **CDBG Public Services – Homeless:** Provide services for persons experiencing homelessness or at-risk of becoming homeless, including individuals, families, unaccompanied youth, and/or persons with special needs. 6. **CDBG Public Services - Fair Housing:** Provide fair housing education and counseling services to low- and moderate-income persons.

Hope has been able to work participants to build an individualized educational plan. This also includes additional 1:1 coaching and support to alleviate barriers and foster success. This funding made it possible to supply Trainee stipends to participants of the Training Academy. These are provided to ease financial burdens and are used as a financial literacy tool. Housing Hope would strongly urge Snohomish County to secure a replacement funding source so these essential services can continue without disruption. Supporting employment and education is one of the most effective ways to reduce poverty and ensure long-term stability in the community. Thank you for the opportunity to share the positive impact this funding has provided.	Questions about funding opportunities, project eligibility, or applications for funding may be submitted to OHCD.Funding@snoco.org.
Matthew Rhodes: I am writing to voice concerns on issues I want to address for any funds going to developers to build affordable housing. In my city (Gold Bar) we had a new development built all within the past year which is now known as Falls View. Within only 8 months of my time living here we now have 2 short term rental aka Air BNB / VRBO permits that are to be approved to operate in these single family residential homes. This is a 39 unit community in total for reference. These are not just some sparsely populated cabins in the woods. The people who applied for these homes to have a short term rental permit literally do not need them and are just turning them into side hustle pet projects. All this continues to do is drive up affordability for starter homes and pushes people trying to grow or start a family totally out of the market. As housing prices have rapidly climbed and have only just recently modestly stopped growing, I believe somewhere around 0.9% to 1.4% depreciation depending on which metric you use the average	The County thanks Mathew for the concerns and comments. The CDBG and HOME funding provided for affordable housing development must follow all zoning and land use development laws, and federal funding for development of affordable housing requires use restrictions tied to the properties for up to 40 years. The County also funds purchase assistance programs for first-time homebuyers with CDBG or HOME funds, and as required by regulation, the home must be the primary residents of the homebuyer, which is enforced through a use restriction tied to the property.

couple let alone individual cannot compete with those wealthy enough to own multiple homes. None of these homes were ever built to be a business yet local City officials approved / will approve the permits for them anyway despite giving us a town hall making current residents think we had a voice to stop which they later admitted had no bearing and carried no weight in their first permit approval issued on 01/05/2026. I am sharing my own story as a concerned resident of Snohomish County and my opposition for the awarding of any funds approved for affordable housing communities without strictly enforced zoning requirements and land use development laws that allow these short term rentals to slip through the cracks. Any developers awarded these funds who sale to individuals or corporate entities, LLC'S etc. need to also be held accountable. This is a backdoor loophole which destroys the neighborhoods, pulls money from local hotel/motel businesses as they are forced to compete therefore also affecting job growth and leading to cuts and reduced amounts of employees working in such service industries. In conclusion, if Washington State and Snohomish County truly want to address affordable housing more action must be taken to address these real issues facing our real estate economy by stopping wealthy housing developers, investors, and corporations from continuing to price out average residents from owning a homes they don't need all while taking advantage on all the tax based subsidies awarded from these various grants.	
Jay Kang, CEO – Homage: As Snohomish County evaluates community priorities for 2026, we urge you to center the health, safety, and stability of the county's most isolated and vulnerable older adults	The County appreciates the many years of partnership and collaboration with Homage and values their continued

and adults living with disabilities. For more than 50 years, Homage has provided essential services that help these residents maintain their health, independence, and ability to safely remain in their homes. Through our interconnected programs, Minor Home Repair, Senior Nutrition, Transportation, Mental Health, and Social Services, Homage meets basic needs while enhancing quality of life for thousands of vulnerable community members each year. Homage plays a critical role in advancing the County's goal of preserving affordable housing through our Minor Home Repair Program. Health and safety repairs for existing homes are one of the most cost-effective strategies for stabilizing the county's most affordable housing stock while allowing older and disabled adults to continue living independently. Over the past 12 months, 641 low-income seniors and disabled homeowners have benefitted from essential repairs ranging from grab bars and smoke detectors to roof, ramp, and heating system repairs- improvements that directly prevent injuries, reduce emergency service calls, and keep people safely housed. Homage also supports the County's priority to fund public services for non-homeless special needs populations through our Meals on Wheels program. Meals on Wheels delivers 7–14 nutritious meals each week to homebound seniors and adults living with disabilities who cannot shop for or prepare meals on their own. Each delivery provides not only food but also a wellness check and social connection, services that promote physical well-being, reduce isolation, and help prevent premature institutionalization. Over the past year, more than 1,500 Snohomish County residents received home-delivered meals along with referrals to additional Homage and community services that support health, safety, and independence.	commitment and service to the County's most vulnerable residents. The 2026 Annual Action Plan includes funding for two Homage programs: ➢ Homeowner Minor Home Repair: An affordable housing program which provides health and safety repairs to homes owned and-occupied by low-income elderly persons and persons with disabilities; and ➢ Food and Nutrition Services: A public Service project which provides home delivered meals for home-bound seniors and people with disabilities.

Homage has long partnered with Snohomish County to help older adults and adults with disabilities, age independently and with dignity. As demand for services grows with the aging of the population, reductions to other safety-net programs, and ongoing economic pressures, continued County support for Homage programs will be essential to meeting the community's needs for safe housing, nutritious food, and critical supportive services. Thank you for your consideration.	
Jessica Day: Regarding my circumstances, I have reached out to legal services, thank you. I would Like to mention that in the previous action plans It had read as follows: Client choice- is an essential component of housing first. Individuals and families are more likely to maintain housing stability when they have a choice in housing and services. I feel as if there are barriers between the plan and what is implemented within the organizations. With the policies set forth, people don't have a choice. RRH placed my parents into a 3 bedroom because they sleep in separate bedrooms and use one for medical equipment for each of them, RRH gave them a choice! They have been safe and established. The transition from RRH to permanent housing shouldn't have changed anything and it created barriers. My parents don't have a choice now. Organizations are funded and we the community trust these programs to help us, to directly adhere to the mission statements and values set forth to serve and protect our family's and seniors. I believe prioritizing funding is essential, and I believe in policies but there are policies that have direct negative results in our community from such organizations, who receives such funding. To keep families housed, is one of the most important ways we can address this regions	The Consortium thanks Jessica for the comments. This request for comment is specific to the 2026 Annual Action Plan, which implements HOME, CDBG and ESG funds. Federal funding provided to the Consortium and implemented through the Consolidated Plan, included rules, regulations, and other requirements tied to funding sources. The County, as the administrator of the funds, is required to follow and implement federal requirements provided for each funding source.

homelessness crisis. If these policies are creating barriers, then the policies need to be changed, evaluated and revised. To maximize funding. My understanding, it comes down to the county, it is the County's decision for Spending unnecessary funds to up-root my parents into a high priced one-bedroom vs their current established cheaper three-bedroom because of a policy barrier within those funds. There has got to be ethical boundaries for this funding, that protects individuals to ensure integrity of all programs and people should have a choice, to maximize funding. I feel, as do many, the counties choice to spend unnecessary funds to force my parents out of their home, from such programs that are funded by the plan, and which programs placed my parents into their 3-bedtoom in the first place, needs revision. If such policies create barriers within the plan, to spend unnecessary expenses, those policies need revision as well. So, there is a successful community funding and development plan. Every circumstance is different, to adhere to certain policies, but each circumstance deserves the right to fair evaluation. Thank you for giving the community an opportunity to comment.	

Appendix 2 to AP-12: 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.

$$\frac{\text{Direct HOME Subsidy}}{\text{Direct HOME Subsidy + Homebuyer Investment}} \times \text{Net Proceeds} = \text{HOME Recapture}$$

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:

$$\frac{\text{Homebuyer Investment}}{\text{Direct HOME Subsidy + Homebuyer Investment}} \times \text{Net Proceeds} = \text{Amount to Homebuyer}$$

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.

APPENDIX 2 TO AP-90: HEARTH LOCAL PROGRAM STANDARDS

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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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 form 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.

Table 5.4	***ESG Homelessness Prevention – Eligible Activities***
Housing Relocation & Stabilization Services	
Short- and/or Medium-Term Rental Assistance	

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.

Table 5.5	***ESG Rapid Re-Housing – Eligible Activities***
Housing Relocation & Stabilization Services	
Short- and/or Medium-Term Rental Assistance	

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)*

Table 5.6	***ESG Administrative Costs***
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.		

Table 5.11	***CoC Leasing – Key Requirements***
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	

Table 5.13	CoC Rental Assistance – Key Requirements
Unit Rent Standard	The unit rent must be reasonable in comparison to similar units and cannot exceed comparable unassisted units. *See Section XIII.d,* Rent Reasonableness and Fair Market Rent.
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.). *See Section XIII.e,* Housing Agreements.
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*.

Table 5.14	CoC Supportive Services – Eligible Costs	
Annual Assessment of Service Needs	Assistance with Moving Costs	Case Management
	Food	Housing Search & Counseling Services
Employment Assistance & Job Training	Outpatient Services	
	Education Services	Outreach Services
Mental Health Services	Substance Abuse Treatment Services	Legal Services
Child Care		Transportation
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*			

Table 5.16	***CoC Operating – Key Requirements***
Unit Rent Standard	Not applicable.
Unit Lease	Participants must have a lease or occupancy agreement with the recipient. *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.

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.

Table 5.17	***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

Table 6.1	***Eligibility By Component***						
Component	**Funding**	**Homeless Status Category***			**Income****	**Disability**	**Chronic Homeless (CH)**
		1	2	4	30%		
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

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:

(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.

Table 6.2		***Homeless Eligibility Criteria***	
Cat.	**Description**	**Component**	**Criteria**
1	**Literally Homeless**	*Emergency Shelter* *Transitional Housing* *Rapid Rehousing* *Permanent Supportive Housing*	**A household is literally homeless if they lack fixed, regular & adequate nighttime residence, meaning:** • 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**	*Emergency Shelter* *Transitional Housing* *Prevention*	**A household that will imminently lose their primary nighttime residence provided that:** • 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**	*Not Applicable*	*Snohomish County is not currently pursuing projects for which this definition would apply*
4	**Fleeing or Attempting to Flee Domestic Violence**	*Emergency Shelter* *Transitional Housing* *Prevention*	**Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or other dangerous or life threatening conditions related to violence, who:** • 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).

Table 6.3	***Disability***
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 *person with disabilities* 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-familys-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 do 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.

Table 7.1		***Homeless Verification - Documentation***	
Cat.	**Description**	**Component**	**Documentation**
1	**Literally Homeless**	*Emergency Shelter* *Rapid Rehousing* *Transitional Housing* *Permanent Supportive Housing*	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**	*Emergency Shelter* *Prevention* *Transitional Housing*	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 **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**	*Emergency Shelter* *Prevention* *Transitional Housing*	**For victim service providers:** 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. **For non-victim service providers:** 1. Self-declaration/oral statement by household seeking assistance which states: they are fleeing, they have no subsequent residence, and they lack resources. 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.
*Self-Declarations must generally be accompanied by intake worker documentation of due diligence to obtain third-party verification.			

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

Table 7.2	***Disability Verification***
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.	
*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). **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.	

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.

Table 7.3	***Documenting Duration of Homelessness***
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. 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).
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.	

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 than 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>
<tr><th>Table 8.1</th><th colspan="3">Applicable Definitions</th></tr>
<tr><th>Definition</th><th colspan="3">Description</th></tr>
<tr><td rowspan="2">Family</td><td colspan="3">Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons 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.</td></tr>
<tr><td>A household with children is composed of at least one adult and one child (minor under the age of 18).</td><td>A household without children is composed of multiple adults, but no children under the age of 18.</td><td>A household with only children is composed of multiple persons, all of whom are under age 18.</td></tr>
<tr><td rowspan="2">Individual</td><td colspan="3">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.</td></tr>
<tr><td colspan="2">A household without children is composed of a single adult only.</td><td>A household with only children is composed of a single person under age 18.</td></tr>
</table>

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.

Table 8.2	***Minimum Considerations***
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.

Table 9.1	***Shared Housing Requirements***
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

Table 10.1	***Income Inclusions Examples***
Not an exhaustive list; refer to 24 CFR § 5.609(b)	
(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***
Not an exhaustive list; refer to 24 CFR § 5.609(c)	
(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).

Table 10.3		***Mandatory Deductions***
Refer to 24 CFR § 5.611(a)		
(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).

Table 10.4	***Income Review Requirements***	
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 changed 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 (*rent may not be rounded up*): 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, *rounded to the nearest dollar*: 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.

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.

Table 13.1	***Housing Quality Standards – Key Aspects***
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

Table 13.2	***Unit Rent Standard By Component***		
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 *may* 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 *may* 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	**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. **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. **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.	Initially, Annually

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:
    - TA is not implemented by the Subrecipient; or
    - The poor performance is of serious concern; or
    - 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)	Obtain copy of most recent pay stub(s) and include in participant file. *OR Written 3rd Party Verification* 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. *OR Oral 3rd Party Verification* 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. *OR Self Declaration* 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.
Self-Employment and Business Income 24 CFR § 5.609(b)(2)	Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file. *OR Self Declaration* 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.

Interest and Dividend Income 24 CFR § 5.609(b)(3)	Obtain copy of most recent interest or dividend income statement from participant and keep copy in participant file. *OR* Obtain copy of most recent federal and state tax return from the applicant and keep copy in participant file. *OR Self Declaration* 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.
Pension/Retirement Income 24 CFR § 5.609(b)(4)	Obtain copy of most recent payment statement or benefit notice from Social Security, pension provider or other source. Copy kept in participant file. *OR Written 3rd Party Verification* 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. *OR Oral 3rd Party Verification* 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. *OR Self Declaration* 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.
Unemployment and Disability Income 24 CFR § 5.609(b)(5)	Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file. *OR Written 3rd Party Verification* 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. *OR Oral 3rd Party Verification* 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. *OR Self Declaration* 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.
TANF/Public Assistance 24 CFR § 5.609(b)(6)	Obtain copy of most recent payment statement and or benefit notice. Copy kept in participant file. *OR Written 3rd Party Verification* 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. *OR Oral 3rd Party Verification* 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. *OR Self Declaration* 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.
Alimony, Child Support, Foster Care Payments 24 CFR § 5.609(b)(7)	Obtain copy of most recent payment statement, notices or orders. Copy kept in participant file. *OR Written 3rd Party Verification* 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. *OR Oral 3rd Party Verification* 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. *OR Self Declaration* 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.

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 statues 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 sources[2] 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)	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: - 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)	With respect to an individual, means: (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)	Violence committed by a person: (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: i. The length of relationship;

	ii. The type of relationship; and iii. The frequency of interaction between the persons involved in the relationship.
Domestic Violence (24 CFR 5.2003)	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. 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.
Housing Provider	Housing Providers include: (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. The applicable Housing Provider varies by provision; *refer to each provision for further detail on the applicable Housing Provider(s)*. 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.
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)	Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (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)	An assisted individual or family and the members of the household on their lease. 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.

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)	- Agencies - Owner/Landlord
ESG 24 CFR 576.409(b)(4))	- Agencies - Owner/Landlord
HOME Rental Housing Units (acquisition, rehabilitation, new construction) (24 CFR 92.359(a)(2)(ii)	- Owner/Landlord - Snohomish County, as the Participating Jurisdiction
HOME TBRA (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

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	- Agencies - Owner/Landlord
CoC (24 CFR 578.99(j)(4)	- Agencies
ESG (24 CFR 576.409(c))	- Agencies
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction) (24 CFR 92.359(c)(1))	- Owner/Landlord
HOME TBRA (24 CFR 92.359(c))	- 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	- Agencies - Owner/Landlord
ESG	- Agencies - Owner/Landlord

HOME TBRA	- 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)	- 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 individual[4] (any guest[5] or other person under control of the tenants[6]), 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	- Agencies - Owner/Landlord
ESG	- Agencies - Owner/Landlord
HOME TBRA	- 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)	- 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))	- 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 on[7] 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	- Acquisition, rehabilitation, new construction, operating costs - Rental Assistance to Agency-owned housing
ESG	- Rental Assistance to Agency-owned housing
HOME	- 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	- Agencies - Owner/Landlord
ESG	- Agencies - Owner/Landlord
HOME TBRA	- 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)	- 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))	- Agencies - Owner/Landlord, except in specific circumstances*
ESG Rental Assistance (24 CFR 576.409(b)(4))	- Agencies - Owner/Landlord, except in specific circumstances*
HOME TBRA 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
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction) 24 CFR 92.359(a)(2)(ii)	- Owner/Landlord - Snohomish County, as the Participating Jurisdiction

* **Limiting documentation requests by Owners/Landlords**: Agencies may limit documentation requests to only Agencies (to the exclusion of Owners/Landlords), provided that:

i. This limitation is made clear in the Notice and rental assistance agreement;

ii. 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

iii. 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 Professional[8] 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	- Agency administering HOME TBRA program on behalf of Snohomish County - Owner/Landlord - Snohomish County, as the Participating Jurisdiction 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.
HOME Rental Housing Units (Acquisition, Rehabilitation, New Construction)	- Owner/Landlord - Snohomish County, as the Participating Jurisdiction 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).

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 Provider[10]]

Notice of Occupancy Rights under the Violence Against Women Act[11]

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.

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.

[1] Permanent 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 Homeless[3] 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 shelter[4] for at least 12 months[5] 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.

1. **Internal transfers**:
    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.

2. **External transfers**:
    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

October 2017; Revised March 2023

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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)
- *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, or20+ 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). 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). For demographic information on the housing stock, market trends, etc., certifiers should access Research and Statistics (nar.realtor).

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 Hearth 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): Unit: (washer/dryer, A/C, dishwasher, fireplace, balcony/patio, etc.) On-site: (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 *not* 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**):
   $ ÷ 3 = $
   Total Gross Rents divided by # of Comparable Units Average Gross Rent
   (Add Gross Rents of Units B + C + D)

3. **Average Gross Rent for Comparable Units + $100**:
   $ + $100 = $
   Average Gross Rent for Comparable Units plus

4. **Is the Gross Rent for Proposed Unit (Unit A) in Question IV.1. <u>equal to or less than</u> 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 (≤) 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
☐	**SDG/EHP/ESG Rental Assistance**	• Unit gross rent **<u>may not</u>** 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
☐	**CoC/YHDP Rental Assistance**	• Unit gross rent **may** exceed FMR • Must be rent reasonable • Maximum funds may pay is rent reasonableness amount
☐	**CoC/YHDP Leasing**	• 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)

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