

# **Implementation Guide**

## **For Whatcom Homeless Service Center Contractors**



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# WHATCOM HOMELESS SERVICE CENTER IMPLEMENTATION GUIDE

## **I. Contract Management Requirements**

### **A. Duplication of Costs**

Funds awarded under this contract will not supplant other existing funding sources. The Contractor certifies that work to be performed or costs reimbursed under this contract do not duplicate any work or costs to be charged against any other contract, subcontract, or other source.

### **B. Contract Amendments**

The Contractor may request an amendment or modification of this contract. However, such amendments shall not take effect until fully signed by both the County and the Contractor.

If the actions of the County, the Washington State Department of Commerce (Commerce), or changes to state or federal laws, regulations, or funding impact this contract, then the terms and performance of this contract will be amended to reflect these changes.

### **C. Project Manager/Staff**

The Contractor shall notify the County in writing prior to: 1) the designation of a new project manager or new project staff, or 2) a significant change in the responsibilities of the project manager or project staff.

### **D. Performance Standards, Licensing, and Review**

The Contractor shall comply with all applicable local, state, and federal licensing and accrediting requirements and standards and any other standards or criteria established by the County and/or Commerce to ensure quality of services necessary for the performance of this contract. The Contractor shall also comply with the additional requirements contained herein.

The County reserves the right to modify terms of performance standards, measures, and/or outcomes by contract amendment at any time for the duration of the contract.

### **E. Procurement Standards**

The Contractor shall have established procurement policies that comply with the following:

1. A code or standard of conduct that shall govern the performance of its officers, employees, or agents engaged in awarding of contracts using state funds;
2. Transactions that are conducted in a manner to provide, to the maximum extent practical, open and free competition; and
3. Steps to avoid purchasing unnecessary or duplicative items.

## **F. Financial Management Systems and Records**

The Contractor's financial systems shall contain the following:

1. Accurate, current, and complete disclosure of the financial results of the contract.
2. Records that identify the source and application of funds.
3. Control over and accountability for all funds, property, and other assets.
4. Comparison of actual outlays with the budgeted amount for the contract.
5. Procedures for determining reasonableness, allocability, and allowability of costs.
6. Accounting records that are supported by source documentation.
7. A system for timely and appropriate resolution of audit findings and recommendations.
8. Procedures that minimize the time elapsing between the transfer of funds from the County and their disbursement by the Contractor.

If the Contractor's systems do not meet these standards, the Contractor shall maintain a separate bank account for funds provided under this contract.

The Contractor must maintain copies of all reimbursement requests and backup documentation. The Contractor must maintain records that disclose all costs charged to this contract.

## **G. Access to Documents and Records**

The Contractor shall maintain books, records, documents, and other evidence of accounting procedures and service delivery policies and practices that are sufficient to permit the preparation of reports required by the federal funding agency or the state of Washington, and to permit the tracking of funds to a level of expenditure adequate to ensure that the funds have been spent in accordance with federal and state laws, regulations, policies, procedures, and this contract. These records shall be subject at all reasonable hours to inspection, review, or audit by the County, Commerce, the Office of the State Auditor, and federal and state officials so authorized by law.

The Contractor shall provide access to its facilities and personnel at all reasonable times in order to monitor and evaluate performance, compliance, and quality assurance under this contract.

## **H. Records Retention**

The Contractor shall:

- Retain all financial, statistical, property, materials inventory, supplies, participant records, and supporting documentation relevant to this contract for a period of seven (7) years from the termination of the contract; and
- Retain records for non-expendable property for a period of seven (7) years after final disposition of the property; and
- If any litigation, bankruptcy, or audit is begun, or if a claim is instituted involving the contract or agreement covered by the records, retain the related records until the litigation, audit, or claim has been finally resolved.

## **I. Audit Requirements**

If the contract includes funding in excess of \$75,000 in total state funds in a fiscal year, the Contractor must have a financial audit as defined by Government Auditing Standards (The Revised Yellow Book) and according to Generally Accepted Auditing Standards (GAAS).

The Contractor must ensure that audits are performed in accordance with Generally Accepted Accounting Principles; Government Auditing Standards (The Revised Yellow Book) developed by the Comptroller General of the United States, dated 2003.

The audit of the Contractor's program shall be conducted by an independent Certified Public Accounting firm selected by the Contractor.

The Contractor shall maintain its records and accounts in such a way as to facilitate the audit requirements. The Contractor is responsible for any audit exceptions incurred by its organization. The County and CTED reserve the right to recover from the Contractor disallowed costs resulting from the final audit.

The Contractor is responsible for sending the audit to the County as soon as it is available, but no later than nine months after the end of the Contractor's fiscal year. Responses to management findings and disallowed or questioned costs shall be included with the audit report. The Contractor will respond to County and/or Commerce requests for information or corrective action concerning audit issues within 30 days of the date of request. As applicable, costs of the audit are an allowable expenditure.

## **J. Documents on File**

Documents consistent with federal and state regulations, as applicable, shall be kept on file in the office of the local agency and available for review. Such documents shall include, but not be limited to:

- Articles of Incorporation
- By-Laws
- IRS Nonprofit Status Certification
- Latest Agency Audit
- Insurance and Bonding Policies Required by the Contract
- Personnel Policies
- Job Descriptions
- Organizational Chart
- Travel Policies
- Fiscal Management Policies
- Location of handicap accessible facilities and services for homeless families with special needs
- Provision for bilingual public contact employees as appropriate

## **II. Programmatic Requirements**

### **A. Defining and Documenting Homelessness**

1. Participants must be homeless or at imminent risk of homelessness, defined as persons who:
  - a. On one particular day or night, do not have a decent and safe shelter or sufficient funds to purchase a place to stay;
  - b. Are living in places not intended for human habitation;
  - c. Are currently residing in homeless shelters;
  - d. Are living temporarily with family or friends; or
  - e. Are about to be released from prison, jail, or a mental health facility and have no place to return to.
  - f. Are families or youth who live in precarious situations and are unlikely to become stable.
  
2. Program eligibility must be verified and documented. There are three acceptable methods of verifying program eligibility:
  - a. Written: Designed staff requests third party, written verification directly from the information source (i.e. employer, DSHS, Employment Security, family or friends, shelter, or other service provider). If the client is living with family or friends, the client must provide a written statement from family or friend indicating they are only willing to provide temporary shelter until the client finds alternative housing, or an eviction date.
  
  - b. Oral: If verification is oral, designated staff must document the conversation in the client file. This documentation should include the name and position/title of the third party, the date and time of the conversation, and the name and signature of the staff person requesting the verification.
  
  - c. Other (when Written or Oral Third Party Verification is not available): When written or oral third-party verification of homelessness cannot be obtained, the case manager must try alternate methods of verification, including but not limited to personally viewing the client's living situation (e.g., car, homeless encampment, street, or other places not meant for human habitation). When place of residence has been verified, the information must be put in writing and signed and dated by the case manager.
 

In rare cases when the case manager has exhausted all possible means of verification, the case manager must sign and date a description of his/her efforts to verify the client's homelessness. The client must prepare a written declaration of homelessness describing his/her current living situation and explaining why a self-declaration is necessary. All self-declarations must be signed and dated by the client and the case manager.
  
3. All documentation of homelessness must be kept in the client file.
  
4. The Contractor must maintain adequate documentation of homelessness to determine the eligibility of persons served, as follows:

Situation	Documentation
Persons living on the street or in short-term emergency shelter	<b>Written or documented oral verification from a third party. If the verification is taken over the phone, staff must record,</b>

	<p><b>sign, and date the call.</b></p> <p>Information will be obtained to indicate that the participant is living on the street or in short-term emergency shelter. This may include names of organizations or outreach workers who have assisted the participant in the past, general assistance checks and where the checks are delivered, or any other information regarding the participant's activities in the recent past that might provide documentation.</p>
Persons coming from transitional housing for homeless persons	<p><b>Written or oral verification from a third party. If the verification is taken over the phone, staff must record, sign, and date the call.</b></p> <p>Obtain written verification from the transitional housing staff that the participant has been residing at the transitional housing facility. The verification must be signed and dated by referring agency personnel.</p>
Persons being evicted from a private dwelling	<p><b>Written or oral verification from a third party. If the verification is taken over the phone, staff must record, sign, and date the call.</b></p> <p>Obtain written verification of a "pay or vacate" or eviction notice. The notice must indicate that the participant was being evicted before receiving homeless assistance. Also obtain information on the participant's income and efforts made to obtain housing and why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.</p> <p>If the participant's friends or family is evicting, a statement describing the reason for eviction must be signed by the friend or family member and dated.</p> <p>In other cases where there is no formal eviction process, persons are considered evicted when they are forced out of the dwelling unit by circumstances beyond their control.</p>
Persons being discharged from an institution	<p><b>Written verification from a third party. If the verification is taken over the phone, staff must record, sign, and date the call.</b></p> <p>Obtain evidence from the institution's staff that the participant was being discharged before receiving homeless assistance. Obtain information on the income of the participant, what efforts were made to obtain housing, and why, without the homeless assistance, the participant would be living on the street or in an emergency shelter.</p>
Persons fleeing domestic violence	<p><b>Written, signed, and dated verification from the participant or designated staff.</b></p>

	Obtain written verification that is signed and dated by the participant that the participant is fleeing a domestic violence situation. If a participant is unable to produce verification, designated staff may prepare a written, signed, and dated statement about the participant's previous living situation.
Persons at risk of homelessness	<p><b>Written verification from a third party. If the verification is taken over the phone, staff must record, sign, and state the call.</b></p> <p>The definition of "at risk" is a person who is about to lose his/her home due to circumstances beyond his/her control. Written or documented oral verification may be obtained from third party sources, such as DSHS, other agencies, or a landlord.</p>

### B. Income Verification

1. In order to be eligible for the program, a client's income (gross or net, as determined by Whatcom Homeless Service Center policy) may not exceed 50 percent of the median income for the area. The U.S. Department of Housing and Urban Development (HUD) publishes median income information annually.
2. Verification of income eligibility may include pay stubs, tax statements, verification from employers, DSHS/Employment Security/Social Security documents, oral verification from service agencies that are recorded, dated, and signed by the case manager, or other verification approved by Commerce. All reported income must be verified by the Contractor and documented in the client file.
3. In cases when a client claims no income, the client must prepare a self-declaration that states why he/she has no income and when and how he/she plans to obtain and income. The self-declaration must be signed and dated by the client and the case manager.

### C. Project-Based Leasing of Structures

1. As authorized in Exhibits "A" and "B" of the Contract for Services Agreement, funds under this contract may be used to pay for the leasing costs of buildings and scattered-site units housing eligible tenants. Tenants must receive project-based subsidies, where the subsidy stays with the unit when the tenant moves, becoming available for the next tenant.
2. The monthly leasing costs must be comparable to, and no more than, the rents that are being charged for similar space in the area. Evidence of comparable rents must be kept in the client files or in an easily accessible location.
3. Rents for the leased units may be based on the HUD Fair Market Rents (up to 110 percent of the FMRs) or local market rents for modest, safe units. If local market rents are used, then there must

be documented evidence of area rents in the program files. Documentation may include newspaper advertisements, real estate listings, or rent/market surveys.

#### **D. Tenant-Based Rental Assistance**

1. As authorized in Exhibits "A" and "B" of the Contract for Services Agreement, eligible uses of funds under this contract include the provision of tenant-based rental assistance and related support programs, including:
  - a. Rental subsidies for persons who are homeless or in danger of becoming homeless;
  - b. Furnishing of dwelling units for program participants;
  - c. Security and/or utility deposits, credit checks, and move-in costs; and
  - d. Other uses as approved by Commerce.
2. Rental assistance is tenant-based only, which means that clients choose their housing and the subsidy stays with the client (not the unit) if they move. Rent-assisted housing could include a variety of types ranging from group homes to private-market housing.
3. Comparable Rents
  - a. The Fair Market Rents (FMRs), revised annually by HUD, may be used as rent limits for determining which units are eligible for the program. Under the FMR requirements, rents for subsidized rental units may not exceed 110% of the FMRs. The FMRs include the cost of utilities, except for telephone services. The Contractor may use either FMRs or comparable rents, but not both.
  - b. If the FMRs are not used, the Contractor must ensure that units subsidized rent for a reasonable amount, as compared to rents charged for like units. Bedroom size, year constructed, and amenities should be examined for comparability. Comparable rents can be obtained from newspaper advertisements, real estate listings, rent surveys, or other documented sources of area rents.
  - c. Although documentation of three comparable units is preferable, in some rural areas, this may be difficult. In these cases, comparable units from neighboring communities are acceptable if the rents are similar. Documentation of fewer than three units is also acceptable with a written explanation. The list of comparable rents should be revised at least annually to accurately reflect the current rates, and must be consistent for all subsidized units.
  - d. If the rent is not comparable to similar units, the proposed lease should be disapproved and the client should find another unit.
  - e. If the client wants to live in a unit that exceeds the comparable rent, the Contractor may allow the client to pay the difference between the rental subsidy and the unit rent with his/her own money. In such cases, the Contractor and/or the case manager will provide the client with careful guidance about keeping his/her expenses within his/her means.

- f. Documentation of comparable rents must be placed in each client file or in an easily accessible location.

#### 4. Utilities

When a tenant is required to pay all or part of the utilities for his/her unit and the Contactor wishes to subsidize the costs, the costs of the utilities should be included in the subsidy. If the Contactor does not want to subsidize utilities, the tenant may pay for utilities with his/her personal funds.

#### 5. Portability

Tenants may not transfer assistance to areas outside Whatcom County.

### **E. Supportive Services**

1. As authorized in Exhibits "A" and "B" of the Contract for Services Agreement, funds under this contract may be used to pay for supportive services designed to address the individual needs of clients.
2. Supportive services include:
  - a. Support services for formerly homeless individuals and families residing in transitional or permanent housing and still at risk of homelessness.
  - b. Services to prevent homelessness, such as emergency eviction prevention projects.
  - c. Temporary services to assist persons leaving jails, prisons, or other institutions to prevent them from becoming or remaining homeless.
  - d. Outreach services for homeless individuals and families.
  - e. Other activities approved by Commerce.

## **F. Services at Program Exit**

Clients who have made significant progress at program exit but who are not ready to transition to independent living may be given, in consultation with Whatcom Homeless Service Center staff, up to six additional months of subsidy and/or case management to ease the transition. This may include clients whose income exceeds 50% of the median income for the area.

## **G. Housing Safety Standards and Lead-Based Paint**

### **1. Safety Standards and Inspections**

- a. All units occupied by recipients of tenant-based rental assistance must pass a housing safety inspection unless: (1) the unit is subsidized for no more than 30 days, or (2) the program participant is staying temporarily in a motel or emergency shelter while waiting for more permanent housing. When an inspection is required, it must be conducted by an authorized agency, which may include the Contractor.
- b. The Whatcom Homeless Service Center will establish rental housing safety standards to ensure that every person participating in the program lives in decent, safe housing. The procedures for inspection of subsidized units must be consistent within the program, so that landlords/property owners are subject to the same inspections and requirements for unit approval, denial, and the procedures for remedying repairs.
- c. The Whatcom Homeless Service Center may choose one of two methods of determining unit safety:
  - 1) The HUD Housing Quality Standards (HQS) and inspection procedures, located at [www.hud.gov/officese/adm/hudclips/forms](http://www.hud.gov/officese/adm/hudclips/forms). Then type "HQS Inspection Checklist" into the Search box; or
  - 2) The Commerce Housing Safety Standards (HSS) and inspection procedures, located under "Commerce Forms" on the HGAP webpage at [www.commerce.wa.gov/HGAP](http://www.commerce.wa.gov/HGAP).
- d. If the Commerce HSS is chosen, the HSS form must be used for inspections. The Whatcom Homeless Service Center will develop inspection procedures, including how long the landlord/property owner has to remedy failing items, what will happen if the landlord fails to make repairs, and when subsequent inspections will be performed.
- e. Complete records of all inspections and follow-up actions must be kept in the clients' files.

### **2. Commencement of Rent Subsidy**

The rental subsidy will commence on or after the date the unit passes inspection. No rent subsidy will be paid for the time a unit is occupied before it passes inspection. If a tenant moves in before the unit passes, the tenant will be responsible for the full amount of the rent until the unit passes inspection.

### 3. Tenant Education

- a. Tenants should receive a user-friendly copy of the Landlord-Tenant Law and be informed on how to use this law when problems arise. (Copies of the law are available from the Tenant Union of Washington State at 206.723.0500 or from the local branch of Columbia Legal Services. The law can also be found on the Office of the Attorney General's website at [www.atg.wa.gov](http://www.atg.wa.gov) and the Northwest Justice Project's website at [www.nwjustice.org](http://www.nwjustice.org).)
- b. Tenants must receive a copy of the Environmental Protection Agency (EPA) brochure titled "Protect Your Family from Lead in Your Home."

### 4. Lead-Based Paint

- a. All rental unit inspectors must complete the online HUD Visual Assessment Course and keep the certificate on file.
- b. All units built prior to 1978 must receive a visual assessment for deteriorated paint (i.e. peeling, chipping, and flaking) surfaces as part of the nit inspection.
- c. All units that were built before 1978 and will house children under the age of six must be cleared for lead-based paint hazards prior to move-in (or before the rental subsidy commences if a household already lives in the unit).
- d. Units to be occupied by households with children age six or older or households without children need not receive clearance prior to move-in (or on-set of subsidy); however risks must be clearly explained.
- e. Ensure all households occupying units built before 1978 have received a copy of the EPA-approved lead hazard information pamphlet entitled "Protect Your Family from Lead in Your Home" and a copy of the signed disclosure statement from the landlord. Require a signed statement from the tenant saying he/she received a copy of the pamphlet and statement, and retain copies of these documents in the client file.
- f. If a child under the age of six joins the family after move-in, the unit must be cleared for lead-based paint.
- g. EPA Disclosure Requirements for All Leased Housing Built Before 1978
  - 1) The lessor shall provide the lessee with the EPA-approved lead hazard information pamphlet entitled "Protect Your Family from Lead in Your Home" (EPA #747-K-04-001).
  - 2) The lessor shall disclose to the lessee the presence of any known lead-based paint and/or lead-based paint hazards, in any housing built before 1978 that is being leased. The lessor shall also disclose any additional information available such as the basis for the determination of the lead-based paint and/or lead-based paint hazards, and the condition of the painted surfaces.

- 3) The lessor shall disclose to each lessee the existence of any available records or reports pertaining to lead-based paint and/or lead-based paint hazards. This requirement includes records or reports regarding common areas. This requirement also includes records or reports regarding other residential dwellings in multifamily housing built before 1978, provided that such information is part of an evaluation or reduction of lead-based paint and/or lead-based paint hazards in the housing built before 1978 as a whole.
- 4) If any of the disclosure activities identified in this section occurs after the lessee has provided an offer to lease the housing, the lessor shall complete the required disclosure activities prior to accepting the lessee's offer and allow lessee an opportunity to review the information and possibly amend the offer.
- 5) Refer to the HGAP website ([www.commerce.wa.gov/HGAP](http://www.commerce.wa.gov/HGAP)) under "Commerce Forms" for a sample lead-based paint disclosure form.

h. Information Resources

- 1) For more information about HUD's Lead Regulation, call the regulation hotline at 202-755-1822, ext. 104 or send an email to [lead\\_regulations@HUD.gov](mailto:lead_regulations@HUD.gov).
- 2) Copies of the HUD Regulation 24 CFR Part 35 and other documents containing technical information are available from HUD USER at 800-245-2691, from HUD user's website at [www.huduser.org](http://www.huduser.org), or from Community Connections at 800-998-9999.
- 3) Copies of the EPA pamphlet "Protect Your Family from Lead in Your Home" are available from the National Lead Information Center at 1-800-424-LEAD.

## H. Eligible Costs

### 1. Project Operating Costs

- a. Only the portion of costs directly related to the operation of the housing projects is eligible. For example, in cases of shared utilities, operating funds may pay only for the portion of the utilities associated with the project, based on the square footage of the project's space. If the housing project occupies 25 percent of a building's space, then up to 25 percent of the monthly utility bill can be paid for using HGAP operating funds.

## 2. Rental Assistance Costs

### a. Rent and Move-In Costs

Allowable costs include initial move-in costs, including utilities, security and utility deposits, first and last month's rent, the tenant costs of credit checks, rent subsidies, and other costs approved by Commerce. All costs associated with moving into and renting a home that are reimbursed under this contract must be consistent with local market practices.

### b. Rental Assistance Operating Costs

Costs related to client intake, assessments, landlord negotiations, case management, housing safety inspections, salaries and benefits, office space and supplies, equipment, telephone, travel, the costs of criminal background checks, urinalysis for drug testing, and other costs approved by Commerce are allowable.

## I. Ineligible Expenses

The following are ineligible expenses:

1. Costs of essential services not directly provided to, or received by homeless households or households at risk of homelessness;
2. Salary of case managers when not working directly on participant issues;
3. Transportation costs not directly associated with service delivery;
4. Depreciation;
5. Bad debts or fees associated with late payments;
6. Costs associated with the organization rather than the program, i.e. advertisements, pamphlets about the organization, etc; and
7. Any activity that supplants or reduces any existing expenditures of public money for the reduction or prevention of homelessness or services for homeless persons.

## J. Local Policies and Procedures

### 1. Minimum Policy Requirements

Policies and procedures must be consistent with the Ten-Year Plan. At a minimum, the policies and procedures for the Whatcom Homeless Service Center must include:

- a. Rent standards.
- b. Rent increases.
- c. Program participant selection policies that clearly specify how program participants are selected. Participants must be selected without regard to race, color, religion, gender, sexual preference, handicap, or national origin.
- d. Forms of assistance.
- e. Subsidy calculations.
- f. Income limits and adjustments.

- g. Housing inspection standards and procedures.
- h. Procedures for applicant denial and termination of participant tenancy.
- i. Procedures for filing grievances.
- j. Local Ten-Year Plan for reducing homelessness.

## 2. Local Preferences

The Whatcom Homeless Service Center may establish local preferences for specific categories of individuals, as long as the categories are identified in the local Ten-Year Homeless Plan and selection policies for the preference categories are clearly defined. Anyone given a local preference may still apply for other forms of assistance.

## 3. Suggestions for Designing Local Policies

- a. Local Applicant Preferences: What (if any) preference categories will you use (i.e. victims of domestic violence, disabled persons, working families)?
- b. Setting up a Waiting List
  - 1) How will you decide who is served first? Will applicants be served on a first-come, first-served basis? By preference? By other criteria?
  - 2) How often will you rank applications within the selection categories?
- c. Applicant Screening Policies
  - 1) What are your criteria for screening applicants? By need, preference, readiness, or other criteria?
  - 2) How do you choose if you have two applicants meeting the criteria and only one space available?
  - 3) Who screens the applicants and who makes the final decision? One position, a committee, or other?
- d. Identifying Forms of Assistance
  - 1) Rent assistance?
  - 2) Security and utility deposits and/or 1<sup>st</sup> and last month's rent?
  - 3) Credit checks?
  - 4) Moving costs?
  - 5) Other?

6) Setting Income Limits and Adjustments

- a) All program participants must have incomes at or below 50% of the median income for the area. Will you use the 50% limit or a lower limit?
- b) Will you allow income adjustments to the subsidy calculation? If so, what will they be?

7) Housing Safety Standards

- a) Will you use HUD Housing Quality Standards or Commerce Housing Safety Standards?
- b) What are the criteria for determining the need for subsequent inspections?

**K. Minimum Client File Requirements**

The Whatcom Homeless Service Center will create a client file for every program participant that contains a minimum of the following items:

1. Every client must have a client ID number. This can be the HMIS personal identifier or any other number that is unique to each client. ID numbers must be in the same location in all client files and visible when the file is opened.
2. Application for assistance and/or client needs assessment.
3. Rental Agreement or Lease.
4. Income, rent, and subsidy calculations.
5. Documented verification of income.
6. Documented verification of homelessness.
7. Housing safety inspections and follow-up.
8. Landlord declaration of the status of lead-based paint for units built before 1978 that will house children under the age of six.
9. Documentation of subsidy payments.

**L. HMIS Requirement**

The Whatcom Homeless Service Center will be responsible for the collection and reporting of HMIS data as follows:

1. The Whatcom Homeless Service Center must participate in an HMIS compliant with state and federal laws, rules and policies including:
  - a. HUD HMIS Data and Technical Standards – FR 4848-N-2.
  - b. State HMIS requirements under RCW 43.185.C.180 and RCW 43.185.C.030.

Information related to the State HMIS is available from Commerce's County HMIS and Homeless Act Compliance Coordinator at 360-725-3028.

2. All homeless service providers receiving state or federal homeless funding can participate under reasonable and equitable terms in the local HMIS (state funds require participation in the local HMIS).
3. Personal identifiers must be collected from clients using legally required written consent that includes a provision allowing personal identifiers to be shared for research purposes only with the Department of Social and Health Services Division of Research and Data Analysis (DSHS/RDA). Client data will only be used to produce aggregate research and will not be used in any way to determine client eligibility or be shared in any way with people outside of DSHS/RDA.
4. Personal identifiers are collected with written consent to share with DSHS/RDA from a percentage of clients consistent with levels of consent obtained in similar programs.

### M. Required Reports

The Contractor must submit the following required reports using required forms ([www.commerce.wa.gov/hgap](http://www.commerce.wa.gov/hgap)) by the dates due specified.

Report	Due Date
Quarterly Report	Due on the last day of the month following the end of the quarter: January 31, April 30, July 31, and October 31 of every year.
Participation in State HMIS OR Client-Level Data Upload via Data Integration	Within 30 days of the end of the quarter; no later than January 30, April 29, July 30, and October 30 of every year.
Annual Audits	As soon as available.