



Community Action Council

of Lewis, Mason & Thurston Counties

April 14, 2022

Thomas Webster
Program Manager
Thurston County Public Health and Social Services
412 Lilly Road NE
Olympia, WA 98506

Dear Mr. Webster:

This letter is a formal response to the written decision in the grievance process submitted by Thurston County Public Health and Social Services (TCPHSS) April 6, 2022. This follows the virtual meeting held on Thursday, March 24th with Tom Webster and Brandon Weber. This is not an appeal under the contract provision, but rather an effort to set the record straight regarding statements made in the grievance response. Unfortunately, we believe an appeal of this decision is futile. The written grievance response did not address the concerns we raised at the meeting. Accordingly, Community Action Council of Lewis, Mason & Thurston Counties (CACLMT) wishes to move forward in our ability to serve our community with funding streams that provide vital and critical services.

In your initial notice suspending the CACLMT contracts you stated: "CACLMT's response on February 14, 2022 to the draft Monitoring Report rejected all recommendations of the Report and indicated that CACLMT is unwilling to take reasonable action necessary to identify and prevent fraudulent payments."

In fact, CACLMT only wanted the County's newly minted program requirements to be made written provisions of the contract between the County and CACLMT. See, Appendix A. We believe that written provisions ensure that all parties are aware of the requirements and those written provisions could be then reviewed by funding partners to determine if those requirements were consistent with programmatic goals.

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Our request for clarification was for transparency and to understand the new requirements of the program. At no time did CACLMT refuse “to take reasonable action necessary to identify and prevent fraudulent payments,” as the Suspension Notice states. The ERA Monitoring Letter offered four recommendations, not findings or discrepancies (see Appendix B). It is vital to note that CACLMT has been monitored successfully by a wide variety of funders with excellent outcomes over the 50+ years of service delivery in the community and have been deemed “low-risk” by the County in the latest risk assessment dated August 20, 2021 (Appendix C).

It is equally vital to note that in, 3 of the 5 files labeled by Mr. Weber as “fraudulent” none resulted in payments to the clients. The other 2 files were clearly documented with proof of eligibility. Furthermore, CACLMT complied with all monitoring requests by providing the required full client database of every client served by the Treasury Rent Assistance Programs (TRAP) over of the full course of contract engagement, as well as access to every document and client file as requested. There is simply no proof of any fraud, and that label’s use in your written documentation is reckless.

The newly minted recommendations in the Monitoring Report were in direct contradiction to the program guidance given to CACLMT from Tom Webster, the Program Manager. Our request was simple: please clarify the processes and policies in writing so that CACLMT can continue to successfully implement the Treasury Rent Assistance Program going forward. Appendix D indicates the correspondence with TCHPSS in response to each recommendation as outlined in the Monitoring Report. Again, claims that CACLMT was refusing to follow recommendations are false. CACLMT merely wanted those provision in writing.

It is critical to note that the processes used by Thurston County were unprecedented. There was no exit interview formally offered to CACLMT from TCPHSS. The debrief meeting on January 4, 2022, was a discussion of a draft Monitoring Report. During this discussion of the draft report, CACLMT provided concerns about the implementation of the recommendations based upon previous and documented guidance, along with the intention of the program as understood by the Department of Commerce and the Treasury.

After CACLMT’s request for clarification (see Appendix A), we received a letter from Tom Webster, Program Manager, on February 18, 2022. He explained that the monitoring will be considered final and this letter contained the first mention of “suspected fraud” regarding the program (Appendix E).

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The Contracts Suspension Notice, and follow-up press release (Appendix K) sent across the state, were both issued on February 24, 2022, after a vote from the Commissioners on the previous business day to suspend the contracts. I document this course of conduct because it is a clear departure from standard practices for both monitoring and auditing contracts of this nature. A fair-minded audience would see this departure from standard practice as an effort to deprive CACLMT of the typical tools and methods to respond to a concern raised by a funder. But that did not occur in this case.

This hasty decision to suspend all Treasury Rent Assistance Program contracts with CACLMT puts vulnerable clients at risk. CACLMT had successfully disseminated over \$23 million in Treasury Rent Assistance funds to the community to over 3,000 households. Out of these 3,000 households, the Thurston County Auditor found only 5 applications with any issues. As noted above, none were fraudulent, and all demonstrated the CACLMT complied with the existing agreements.

It appears clear to us that the monitoring practices of the Thurston County Auditor's office in regard to the TRAP contracts, are designed to target vulnerable clients. The community members we serve are often marginalized and in crisis. Reporting them to law enforcement (Thurston Co. Sherriff and the FBI) and accusing them of attempted fraud or theft, will have a chilling effect on client's safety, security, and confidence in accessing these services from CACLMT and any provider within our community We are grateful that the Thurston County Sheriff rejected the Auditor's efforts to involve him and his department in investigating these vulnerable community members. We are confident the FBI will find nothing to investigate and can declare that to date, we have had no contact with any law enforcement agencies.

CACLMT has a long history of outstanding service to Thurston County community members and without these services, clients would be without heat, a place to call home, support during child abuse trauma, food in food banks and soup kitchens, as well as affordable housing and weatherization services preserving affordable housing stock for the future. CACLMT continues to uphold the utmost ethics, professionalism, and transparency in disseminating funding to the community and will continue to do so in the future.

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It is honor to have been chosen as the trusted entity to provide nearly \$25 million dollars of rental assistance to the community. We are very proud of the work our team has done to achieve such a successful endeavor and the positive impact on the vulnerable members of our county experiencing housing instability during a global pandemic. Community Action Council of Lewis, Mason & Thurston Counties will continue to move forward in our ability to serve our community with funding streams that provide vital and critical services.

Sincerely,

Kirsten York
CEO of CACLMT

Cc: Board of County Commissioners
Ramiro Chavez, County Manager
CACLMT Board of Directors

Additional Appendices

- Appendix F: Original Grievance Filed with TCPHSS
- Appendix G: Meeting Minutes from Grievance Meeting 3/24/22
- Appendix H: Meeting Minutes from TCPHSS / CACLMT Resolution Meeting 3/29/22
- Appendix I: T-RAP Household Information & Eligibility Form created by the WA Department of Commerce (DOC)
- Attachment J: T-RAP Technical Assistance Meeting Slide deck 4/15/21 DOC
- Attachment K: Press Release from TCPHSS dated 2/24/2022
- Attachment L: Email Direction from DOC to OlyCap Re: Commerce oversight

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- Appendix F: Original Grievance Filed with TCPHSS
- Appendix G: Meeting Minutes from Grievance Meeting 3/24/22
- Appendix H: Meeting Minutes from TCPHSS / CACLMT Resolution Meeting 3/29/22
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Appendix A

Treasury Emergency Rent Assistance Monitoring Report 2021-2022

Response by Community Action Council of Lewis, Mason & Thurston Counties

3020 Willamette Dr. NE
Lacey, WA 98516
360-438-1100

Attention: Brandon Weber, CIA, CGAP
Thurston County Auditor
360-490-4211

February 14, 2022

Brandon Weber
Thurston County Public Health & Social Services
412 Lilly Road NE
Olympia, WA 98506

Re: Treasury Emergency Rental Assistance Programs (TRAP) 1 & 2

Dear Mr. Weber:

Thank you for the recent monitoring of our TRAP 1 & 2 Programs. For context, Community Action Council's housing team (to include Kirsten York (CEO), Katrina Kahler-Wilson (Director of Housing), Ali Tope (Housing Program Manager)) have attended weekly rental assistance meetings with Tom Webster, Thurston County (TC) Program Manager and other County staff since 2020. These meetings are facilitated by the County staff – and the agenda includes TRAP client case staffing, policy and protocol discussions, as well as review of policies changes from the federal, state and county level, and their impacts on service delivery dissemination for CAC and Community Youth Services (CYS). Tom Webster provides our organization with guidance and expectations in following and interpreting policies and procedures. Any protocol and processes established for this program are approved by the County before implementation and execution.

Each recommendation as outlined in your letter is contradictory to the continued, consistent guidance/interpretation and technical assistance CAC has received from TC County staff up to this point. They are also based upon an interpretation that does not align with the County Program Manager, who has been, and continues to be, our approval contact for dissemination of this program. Responding to each recommendation with a plan for implementation unfortunately puts CAC in a difficult position of being mis-aligned with our contract oversight. Therefore, we request all required policy changes be agreed upon at the County level and then placed in writing in a contract amendment to which CAC will agree to. Explicit and clear understanding of expectations, policies, regulations and processes in our contracts sets CAC for success in meeting the outcome requirements as set by our funders.

In addition, some details of these recommendations do not align with our understanding of reducing barriers for clients accessing these services and as indicated as critical by the Department of Commerce in delivering this service to the community. In addition, it falls outside our alignment as an agency toward trusting client's documentation as required and provided without subjective decision making on behalf of staff or biases toward low-income clients requesting these services. Clarification from Commerce is requested as to how these recommendations align with best practices in order to ensure CAC is in compliance with all levels of funding oversight for this program.

Sincerely,

Kirsten York
Chief Executive Officer



Appendix B

COUNTY COMMISSIONERS

Carolina Mejia
District One

Gary Edwards
District Two

Tye Menser
District Three

PUBLIC HEALTH AND SOCIAL SERVICES DEPARTMENT

January 24, 2022

Kirsten T. York, MPA
Chief Executive Officer
Community Action Council of Lewis, Mason & Thurston Counties
3020 Willamette Drive NE
Lacey, WA 98512

Ramiro Chavez, PE, PgMP
Interim Director

Dimyana Abdelmalek, MD, MPH
Health Officer

Dear Ms. York,

Thank you for your participating in Thurston County's 2021 subrecipient monitoring of the Treasury Emergency Rental Assistance (ERA) Programs 1 & 2 (Assistance Listing 21.023). Your organization's participation is essential to ensuring funds are used on allowable activities, in accordance with Washington State and Federal guidelines. This review occurred during December 2021, with entrance and exit meetings on November 29th, 2021 and January 4th, 2022, respectively. At these meetings the purpose, scope, and timing of the review were discussed. At the exit meeting, the results of the review and initial observations were discussed with you and your team.

This letter's purpose is to formally communicate the results of the review, including recommendations to improve program compliance and internal controls. Incorporated into each recommendation is reference to authoritative criteria which supports the basis for recommendations. A formal response to each recommendation is requested. In your response please included whether you agree or disagree with the recommendation, actions your organization will take in response to the recommendation, expected completion date, and contact person for follow-up. The information below provides additional details as to the purpose, scope, methodology, results, and audit evidence supporting recommendations. Should you have any questions, please feel free to contact myself or Housing Program Manager Tom Webster. Your response is request by February 7th, 2022.

Sincerely,

Brandon Weber, CIA, CGAP
Thurston County Internal Auditor

Purpose of the Review

To determine whether:

- The Treasury Emergency Rental Assistance (ERA) Programs 1 & 2 (Assistance Listing 21.023) are operating in accordance with Federal, State, and Thurston County Requirements.
- Internal controls have been established to provide reasonable assurance that payments are made for allowable activities, on behalf of eligible households, to legitimate landlords.

Overall Conclusion

ERA Programs are generally operating in accordance with state and federal guidelines. However, program compliance could be improved through enhancing fraud prevention procedures and internal controls.

Acknowledgements

CAC staff were responsive to requests for information and made themselves available to discuss their operations. In addition, the following strengths were observed during the review:

- Cash Management – Processing upwards of \$1 Million in assistance payments weekly.
- Income – Where applicable, all applicants determined eligible were within income limits.
- Cost Allocation – CAC cost allocation policy complied with federal regulations and was applied consistently.
- Staff Costs – Payroll costs charged to the program were supported by records that showed staff time spent working on ERA and non-ERA programs.
- Assistance Applications - Contained the required elements, including financial hardship and housing instability.
- Rent Payment Agreement forms – All applications contained the required form, signed by landlords.

Scope & Methodology

The following key compliance areas were included in the review:

- Allowable Activities
- Allowable Costs/ Cost Principles
- Cash Management
- Eligibility
- Period of Performance
- Reporting
- Procurement
- Special Terms and Conditions

The following documentation provided by CAC was reviewed:

- Cost Allocation Policy
- Financial Policies and Procedures
- 2020 Single Audit

- TRAP Policies and Procedures
- Blank Treasury Rental Assistance Program (TRAP) Eligibility Worksheet
- TRAP File Review Checklist
- 20 Applicant Files & Supporting Documentation, including:
 - 6 applications for rental assistance that were judgmentally selected.
 - 8 applications for rental assistance that were randomly selected, equally divided between ERA 1 & 2.
 - 6 applications that were randomly selected for other housing costs, equally divided between ERA 1 & 2.
- 3 Reimbursement Requests and supporting documentation.
- 1 By and For Organization Contract and Supporting Documentation

The following personnel were interviewed:

- Kirsten York, CEO
- Ali Tope, Housing Program Manager
- Ian Bishop, Data Coordinator
- Sharrie Shumway, Director of Finance
- Mariah Holborn, Accounting Technician
- Josue F, Phone Receptionist
- Noelani J, Intake Specialist

Recommendations

Recommendation 1 – Prioritize Household Applications to Align with ERA Authorizing Statute

The Community Action Council of Lewis, Mason and Thurston Counties (CAC) allows applicants for Emergency Rental Assistance (ERA) to schedule appointments online or over the phone. Appointment time slots are opened twice daily. The appointment slots are divided between priority and non-priority groups. An applicant is eligible for the priority group if they meet one of the following:

- 1) A participant in the Eviction Resolution Pilot Program (ERPP).
- 2) Income at or below 50 percent of the area median income (AMI) and households with one or more individuals who have been unemployed for 90 days before application date.

Applicants that do not meet one or more of the criteria above, may only schedule appointments in the non-prioritized group time slots, which fill up more quickly each day.

CAC's website currently states that households noted in 2) above will be prioritized. However, the website does not provide information on the methods of prioritization (e.g. half of appointments each day will be reserved for priority group applicants). In addition, CAC's website does not provide information about prioritization for households in the ERPP.

The authorizing statute for Treasury [ERA 1](#) (section c(4)(A)) and [ERA 2](#) (section c(2)) requires prioritization of assistance for households who satisfy any of the following conditions:

- The income of the household does not exceed 50 percent of the area median income.

- 1 or more individuals within the household are unemployed for the 90-day period preceding the date of application.

Treasury [FAQ 22](#) affirms the requirement that any applicant who meets either condition (90 days unemployed or 50 percent AMI) must be prioritized. The FAQ also requires the preference system be documented and that all applicants are informed. The methods for prioritization must also be publicly posted on the ERA program webpage, if one exists.

At the exit meeting on January 4th, CAC staff indicated that they understood the Washington Department of Commerce (Commerce) guidance to require both the income and unemployment conditions to be met for prioritization. The County followed up with Treasury Rental Assistance Program Manager Kathryn Dodge at Commerce after the exit meeting. Ms. Dodge confirmed that a household doesn't have to meet both criteria to be prioritized.

Prioritizing applicants in conformity with the ERA 1 and 2 statutes ensures that the highest need applicants are prioritized for assistance. Additionally, in following the prioritization requirements, CAC and the County reduce their risk of being found non-compliant with ERA requirements.

Thurston County Recommends CAC:

- Modify the scheduling of ERA appointments to ensure that all applicants meeting one or more of the following conditions are prioritized:
 - Income at or below 50 percent of the AMI.
 - Household has one or more individuals who have been unemployed for 90 days at the time of application.
- Update the ERA website page to reflect changes made to the prioritization process so that all applicants are informed about the methods of prioritization.

Recommendation 2 – Enhance Policy for Confirming Applications are Accurate and Complete

The United States Treasury (Treasury) and Washington Department of Commerce (Commerce) have provided guidance on implementing the ERA Programs 1 and 2. Much of the guidance is around ensuring the accuracy and completeness of information used in making eligibility determinations. CAC ERA policies and procedures have been designed to comply with this guidance.

Treasury [FAQ 1](#) allows written attestation in lieu of obtaining documentation for determining eligibility in many situations. However, in all cases, applicants must attest that the information that they have provided is accurate and complete. A Commerce FAQ ([pdf page 9](#)) states, "Grantees should work to obtain the household's signature when possible and can accept verbal verifications when barriers to doing so arise. The FAQ further explains that grantees must state in their required Self Declaration Policy under what circumstances they accept verbal verifications in place of actual signatures.

The current CAC practice, as observed, defaults to verbal verification, regardless of whether barriers exist for a specific applicant. The current policies and procedures do not address the use of electronic signatures or verbal verification in lieu of obtaining a signature. The current spreadsheet used to document applicant eligibility information does have a section for a signature on the "selfdec" tab, which notes electronic signatures are allowed. CAC stated that they changed to verbal verification in lieu of obtaining signatures due to previous challenges that arose in obtaining this information, combined with the pressure to process applications more quickly.

Thurston County Recommends CAC:

- Enhance ERA policies and procedures to ensure applications are accurate and complete by defining when verbal attestation in lieu of written or electronic signatures will be allowed.
- When verbal attestation is used, provide clear guidance as to what the applicant is confirming is accurate and complete.
- Provide formal training to all CAC staff and contractors that are involved in processing applications for eligibility.

Recommendation 3 – Comply with Subrecipient Monitoring and Management Federal Regulations

The Washington Department of Commerce allocated a portion of rental assistance funding to be used for subgrants to “By and For” organizations. The intent of these subgrants is to ensure that marginalized communities have equity in access to rental assistance. In Thurston County, these funds were passed through to CAC. CAC has in turn identified local organizations to contract with to perform services under the ERA program. These services include education, outreach, and processing rental assistance applications. In discussion with CAC, each organization that met Commerce’s criteria as being a “By and For” organization was offered a contract. These contracts were not competitively bid, rather they were individually negotiated with each organization based on the expected cost of providing the requested services.

The Federal Uniform Guidance (2 CFR 200) describes the requirements that must be followed when using federal funds. When funds are provided to other organizations, each entity must make a case-by-case determination whether each agreement it makes for the disbursement of federal funds casts the party receiving the funds in the role of a subrecipient or contractor ([2 CFR 200.331](#)). Entities who have agreements with a subrecipient must follow the requirements in 2 CFR 200.331-333.

The determination of whether an entity is a subrecipient or a contractor is critical to understanding what Federal requirements must be followed. In review of the agreement with one “By and For” organization, the characteristics of the agreement reflected a subaward or a subrecipient relationship between CAC and the organization. The characteristics of a subrecipient as outlined in (2 CFR 200.331a) include:

- 1) Determines who is eligible to receive what Federal assistance;
- 2) Has its performance measured in relation to whether objectives of a Federal program were met;
- 3) Has responsibility for programmatic decision-making;
- 4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- 5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

Treasury [FAQ 21](#) notes that grantees may use ERA payments to make subawards to other entities. This FAQ also reaffirms that the subrecipient monitoring and management requirements set forth in 2 CFR 200.331-333 apply. In review of the agreement and the process for entering into the agreements, key

requirements for subawards were not followed. These requirements include performing a risk assessment and including specific data elements in the agreement.

Thurston County Recommends CAC:

- Update their financial policies and procedures to include processes and controls for entering into agreements with subrecipients.
- Update the agreements with “By and For” organizations to ensure compliance with 2 CFR 200.331-333, including documenting a risk assessment and monitoring activities.

Recommendation 4 – Implement Reasonable Measures to Prevent Fraud, Waste, & Abuse

On December 16, 2021, Treasury provided additional information on how to report fraud, waste, and abuse for ERA (Emergency Rental Assistance) grantees and applicants ([link](#)). The Treasury Office of Inspector General (OIG) noted that grantees should implement reasonable measures to identify fraud, waste, and abuse. Additionally, the OIG stated that fraud should be reported to applicable law enforcement agencies. Treasury ERA FAQs ([8-25-2021 Version](#)) notes that grantees have the responsibility to implement reasonable steps to prevent, detect, and report fraud. FAQ 1 notes that grantees must have controls in place to prevent fraud. FAQ 31 notes that grantees are to apply reasonable fraud prevention procedures and to investigate and address potential instances of fraud or the misuse of funds that they become aware of.

The Washington Department of Commerce (Commerce) has issued guidelines and FAQs that should be used by grantees in administering ERA funds. In these guidelines updated on October 22nd, 2021 ([link](#)), Commerce requires (section 7.8.1.6) grantees to develop an ineligible use of funds policy. This policy states that, “Reasonable attempts must be made to prevent ineligible use of funds.” In addition, “Grantees must have a written procedure for when fraudulent activity by the landlord or household is suspected that includes the following components:

- ✓ Steps for investigating
- ✓ When to notify law enforcement
- ✓ How grantees will seek return of funds if substantiated”

Commerce provides further direction on developing a policy, including a sample policy for grantees ([link](#)). In the sample policy provided by Commerce, additional controls to prevent fraud are described. These controls include being on the lookout for inconsistent or incomplete information, “red flags”, and performing a search to ensure that the property exists. In addition, when red flags indicate a potential fraud, additional steps are prescribed, including performing a search of property ownership on the Assessor’s website. Commerce also provides a sample denial letter and a letter requesting return of payments improperly received.

CAC has established policies and procedures for the ERA Program. Included in these policies and procedures is a section that addresses ineligible use of funds. This section describes steps that intake staff will perform when there is suspected fraud. These steps include:

- i. Intake staff will use tools such as Thurston County Assessor and Google Maps to research the details in the application.
- ii. Intake staff will notify their Supervisor if there is suspected fraud.

- iii. If the suspected fraudulent activity happens before a payment is processed, the application will be denied with email or phone call notice.
- iv. If the payment is processed and CACLMT is made aware of potential fraud, the fraudulent activity will be handled by the fiscal department.

The ineligible use of funds section does not include all the elements required by Commerce. Additionally, the policy is unclear about what steps are to be taken after the supervisor is notified, who is responsible for investigating, and what actions the fiscal department will take. Additionally, there is no guidance on what factors or circumstances would raise “red flags” for potential fraud to initiate additional review procedures. During review of 14 applications for rental assistance, six applications raised red flags that were indicative of potential fraud. Of the six, two applications had been placed on hold by CAC pending a request more information. The following scenarios were identified during this review and were indicative of potentially fraudulent payments:

- 1) One payment was mailed to the address provided by the landlord. The resident who lived where the check was mailed called CAC and communicated that they did not know the payee on the check, that the person did not live there, and that they would return the check.
- 2) One payment was made where the renter and a landlord indicated that they lived at different units in a duplex, with A and B units. In review of the assessor’s website, the property address was a manufactured home and did not have separate units.
- 3) One payment was made for a house that was rented in 2020, but according to the Assessor’s website was not built until 2021. Additional research with the City of Tumwater found that the Certificate of Occupancy was not issued until summer of 2021, more than a year after the property was allegedly rented. This same landlord had also received previous payments from other rental assistance applications.
- 4) One payment was made for a property address that could not be located through an internet search or the County Assessor’s website.
- 5) One payment was made to a landlord that did not have a documented connection to the property. This file contained other red flags, such as an applicant with no income who did not request utilities or any other housing assistance. Additionally, the lease was from 2016 and there was no other documentation that tied the applicant to the property address.

After testing of applications was completed, these concerns were discussed with CAC and a follow-up email was provided with notes about the applications in question. CAC indicated that they had performed some follow-up with the applicants and/ or landlords but had not received any additional information at the time of the exit meeting on January 4th. At the time of this letter, not additional information had been provided supporting the appropriateness of the rental assistance payments in question.

Thurston County Recommends CAC:

- Complete follow-up of the questionable payments identified and communicate the results to the County. For any payments that that are determined to be inappropriate, seek recovery from the payee and report the matter to law enforcement, as applicable.
- Update ERA policies and procedures to better identify, prevent, and investigate potential fraud. In the update, address the following areas:
 - “Red Flags” that may be indicative of a potentially fraudulent application.

- Steps to be taken when fraud is suspected, including staff person or persons responsible, investigative procedures, and requirements for documenting the results.
- When and how law enforcement will be notified.
- When and how the County will be notified about suspected fraudulent activity.
- The process for recovering funds when improper payments have been made.
- Provide formal training to all CAC staff and contractors that are involved in processing applications for eligibility or processing rental assistance payments.
- Provide a draft of policy updates and a training outline to the County for input, prior to implementation.
- Implement the following internal controls to strengthen the eligibility process:
 - Perform a search on every address to ensure the property exists.
 - Look-up property ownership information on the Assessor's website and verify that the landlord owns the property or is authorized to accept payments on behalf of property owner. Perform this step for all applications, or at minimum, for those that meet pre-determined "red flags" or other CAC determined conditions.
- Update the ERA webpage to include information about how CAC is preventing rental assistance fraud and how citizens can report suspected rental assistance fraud.

Appendix C



PUBLIC HEALTH AND SOCIAL SERVICES

OFFICE OF HOUSING & HOMELESS PREVENTION

Risk Assessment Form for Non Profits /Tribes

Jurisdiction/Organization/Tribe: Community Action Council of Lewis Mason & Thurston Counties

Recipient Program/Department: Homeless Services

Person(s) completing the form: Kirsten York

Title: CEO

Phone / Email: 360-438-1100 / kirsteny@caclmt.org

Date submitted to Thurston County Public Health and Social Services (TCPHSS): 8/18/21

Assessment Questions

Please answer each question completely and provide supporting detail where requested.

1	<p>Explain any organizational restructuring that occurred within the last 12 months that affect TCPHSS contracts. Make sure to discuss the following:</p> <ul style="list-style-type: none">• Organizational changes (divisions, departments, units)• Programmatic changes (services being provided, level of services, etc)• Business systems (which can include financial, human resources, programmatic, etc) <p>Leadership position turnovers transpired over the last 12 months. Timeline and replacements explained below.</p> <p>Provide details of the restructuring, the timeframe for which this has/is occurring and the status of the change.</p> <ul style="list-style-type: none">• April 2021: exit of CEO, installation of Interim CEO (Kirsten York)• May 2021: exit of CFO• July 2021: Interim CFO onboard, permanent recruitment open for CFO / Kirsten York appointed as permanent CEO as of 7/1/21

2	<p>Describe turnover in key positions during the past 12 months in those areas of the organization that administer or support TCPHSS programs for the following categories. Along with the description, include the number of positions/FTEs for each category</p> <ul style="list-style-type: none"> - Executive management/Tribal executive management staff - CEO - Fiscal – CFO & Accounts Payable - Council, Commissioners/Tribal Council – none <p>Describe your plan and timeframe for filling, training, or covering the duties of any vacant positions. Upon vacancy of CEO position, Interim CEO appointed – permanency established as of 7/1/21. Upon vacancy of CFO position, Interim CFO appointed and recruitment open for permanent CFO. Accounts Payable – filled.</p>
3	<p>Describe specific government 1) grant administration and 2) contract administration experience for the following categories of staff:</p> <p>Executive management CEO (13 years experience), Director of Emergency Services (40 years experience), Director of Housing & Health (8 years experience), Director of Monarch (15 years experience) = 76</p> <p>Fiscal/bookkeeping staff Director of Finance (25 years of experience) Interim CFO (20 years) = 45</p> <p>Include the total number of years experience for each of the categories above.</p>
4	<p>Does any pending litigation or legal action negatively impact service delivery and/or funding? No</p>
5	<p>For contracts with the TCPHSS, has your organization/Tribe terminated or has TCPHSS terminated any contracts in the last 24 months because of performance or compliance issues? If yes, please explain the circumstances. No</p>
6	<p>Have you had an audit in the last 24 months? YES</p> <p>If not, explain why an audit was not needed/required.</p> <p>If you have had an audit, explain the type of audit (e.g. financial, federal compliance, internal control, etc). Uniform Guidance Audit</p>
7	<p>List any audit findings you have received from an external entity within the last 24 months. None</p> <p>If findings were included in the audit, please describe the corrective action plan and state if it is either in progress (providing detail on the status for implementation) or has been completed.</p>
8	<p>Have you, or do you intend to sub grant or sub contract any funds received from TCPHSS? No</p>
9	<p>Does 20% or more of the total funding for your organization come from TCPHSS? Please use a two or three year analysis to answer this question. Yes</p> <p>If your organization has experienced “funding swings” where one fiscal year you receive 20% or more of your total funding from TCPHSS and in another you do not, please explain why this has occurred. The “funding swing” transpired with the addition of large amounts of ERAP (Eviction Rent Assistance Program) and TRAP (Treasury Rent Assistance Program) funding.</p>

<p>10</p>	<p>Explain the management/board/or council's role in the following:</p> <ul style="list-style-type: none"> • monitoring financial and programmatic compliance; The management plays an integral role in monitoring financial and programmatic compliance. This is done in the fiscal office through checks and balances, with the Division directors, down through Program Managers and Coordinators. All grants are tracked extensively on the financial and policy end. The Board receives notices of every monitoring the Council's programs experience. • evaluating or assessing the performance of the executive director The Personnel Committee of the Board of Directors is in charge of handling the performance evaluation of the Executive Director. On an annual basis, this committee solicites feedback from other Board members and the management team on the ED's performance to inform the final evaluation. • developing policy The management team's role is to develop, implement and evaluate the success of programmatic policy, grant policies and internal protocols. These are done through a team approach, pooling knowledge, experience and resources of best practices- whether within the organization or from outside the organization. • reviewing programmatic results Both the management and the Board review programmatic results on a regular basis. The Board receives programmatic reports from the CEO on a monthly basis.
<p>11</p>	<p>How many years has your organization/Tribe (not staff experience) administered federal or state funds?</p> <ul style="list-style-type: none"> • federal funds 55 • state funds 55

Kirsten York

From: Arielle Benson <arielle.benson@co.thurston.wa.us>
Sent: Friday, August 20, 2021 1:26 PM
To: Kirsten York
Cc: Beverly Hartsell; Katrina Kahler-Wilson
Subject: RE: PY2022 Thurston County Risk Assessment

Hello, good afternoon,

Thank you for returning this by the requested date. I have scored the risk assessment, and the result was 15 – or Low Risk. I am working on putting together a monitoring calendar, and will reach out to let you know the timeframe we are looking at. At a minimum you will receive 30 days written notice, along with areas to be monitored. Per the monitoring plan it will be light desk monitoring and an on sight at least once every 3 years. I will need to look when the last on-site monitoring for CAC was, if one has been done.

If you have any questions please let me know,

Thank you and have a good weekend,

Arielle Benson, MPA

(She/her/hers)

Homeless Program Specialist

Office of Housing and Homeless Prevention

Thurston County Public Health & Social Services

Desk: 360-867-2662

Mobile: 360-490-1280

arielle.benson@co.thurston.wa.us

From: Kirsten York <kirsteny@caclmt.org>
Sent: Wednesday, August 18, 2021 11:07 AM
To: Arielle Benson <arielle.benson@co.thurston.wa.us>
Cc: Beverly Hartsell <BeverlyH@caclmt.org>; Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Subject: RE: PY2022 Thurston County Risk Assessment

Good morning,

Please find the completed Risk Assessment for CAC PY22.

Thank you,

Kirsten

From: Arielle Benson [<mailto:arielle.benson@co.thurston.wa.us>]
Sent: Friday, August 6, 2021 11:37 AM
To: Katrina Kahler-Wilson <KatrinaK@caclmt.org>; Kirsten York <kirsteny@caclmt.org>
Subject: PY2022 Thurston County Risk Assessment

Good morning,

I am writing with the Program Year 2022 Risk Assessment for Community Action Council - LMT. As a reminder this is linked to the Thurston County grant monitoring plan, and will place CAC at one of 3 levels of risk (low, medium, or

high). I will commit to sending you the results of your risk assessment within 1 week of receiving it back. I would like to request that you return it to me no later than Friday August 20th, 2021. That is 2 weeks from today. Make sure the person(s) who fill this out have a comprehensive understanding of the organization.

If you have any questions let me know.

Thank you, and I hope you have a nice weekend.

Arielle Benson, MPA

(She/her/hers)

Homeless Program Specialist

Office of Housing and Homeless Prevention

Thurston County Public Health & Social Services

Desk: 360-867-2662

Mobile: 360-490-1280

arielle.benson@co.thurston.wa.us

Appendix D

Heather Leidner

From: Katrina Kahler-Wilson
Sent: Wednesday, April 13, 2022 3:55 PM
To: Kirsten York
Subject: FW: Community Action Counsel

-----Original Message-----

From: Ali Tope <AliT@caclmt.org>
Sent: Wednesday, December 15, 2021 12:52 PM
To: 'Thomas Webster' <thomas.webster@co.thurston.wa.us>; Katrina Kahler-Wilson <KatrinaK@caclmt.org>; Kirsten York <kirsteny@caclmt.org>
Subject: RE: Community Action Counsel

Hi Tom,

Thank you for letting us know about this correspondence. I am familiar with the case, but will do some more research and get back to you soon with an update.

Best,
Ali

-----Original Message-----

From: Thomas Webster [mailto:thomas.webster@co.thurston.wa.us]
Sent: Wednesday, December 15, 2021 12:29 PM
To: Katrina Kahler-Wilson <KatrinaK@caclmt.org>; Ali Tope <AliT@caclmt.org>
Subject: FW: Community Action Counsel

Katrina/Ali -

Passing along this message that came to me through Commissioner Mejia from Mayor Ryder. As we talked about this morning, we know that CAC has internal policies to identify and prevent fraud. As you've also seen in a couple other instances, we see landlords that are pushing to paid for tenants that have left a property. With changes in Commerce forms, this will be more possible - I think we can talk about how to message this to landlords - maybe something Elisa can develop something around.

If you have anything you want to share around this specific case, please do so, but not necessary. I'm mostly just passing along so you know what the mayor's and commissioners are hearing.

Tom

-----Original Message-----

From: Carolina Mejia-Barahona <https://urldefense.proofpoint.com/v2/url?u=http-3A__carolina.mejia-40co.thurston.wa.us&d=DwlGaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-v5A_Cdp gnVfiiMM&r=lUnRhQAWupmPfwDf6G3j2g&m=ITxAZLroTP2015_2qxLHPwyG2meTyw4kci42vLxj5rs&s=gxtqXyrBfeYxNtEt2dhDisApcEsjGQWm76pRmpjRZA8&e=>>
Sent: Wednesday, December 15, 2021 10:59 AM
To: Keylee Marineau <https://urldefense.proofpoint.com/v2/url?u=http-3A__keylee.marineau-40co.thurston.wa.us&d=DwlGaQ&c=euGZstcaTDllvimEN8b7jXrwqOf->

Kirsten York

From: Ali Tope
Sent: Wednesday, November 17, 2021 12:16 PM
To: 'Dodge, Kathryn (COM)'; Thomas Webster; Baldwin, Mary (COM)
Cc: Katrina Kahler-Wilson; Kirsten York
Subject: RE: Language that supports By and For Category being used for financial assistance

Hi Kathryn,

Thank you so much for the response. We appreciate the clarification and the additional information about the By and For funds. We also appreciate the willingness to explore the strategy that we are proposing.

It is clear in the intention that Commerce intends the funding in this line item category to go toward supporting By and For organization's directly, which is why CAC has provided MOU opportunities to cover all costs associated with the dissemination of this work by these organizations in full.

However, the concern is this pot of funds is much larger than the costs associated with the MOU invoices from these organizations. And failing to spend the funding in this category has larger implications – that the need for this support and the connection/collaboration to By and For organizations in our communities isn't fully there if the funds are fully expended. The request to utilize this pot for the rent/utility voucher costs attached to the clients being directly served by these organizations is a strategy to fully utilize this pot of funds and show the direct fiscal impact these organizations have on the community. It is understandable if there was not enough to cover basic expenses to the orgs directly.

We can also agree to ensure these funds are used to support the agency's directly FIRST. And then rent/utility expenses will be charged if there is excess and the need is there to spend these funds. Otherwise, the rent/utility payments of vouchers can be taken out of the general rent/utility line item.

We will be reaching out to our By and For organizations to have the discussion and ask that they send in their responses. I will send those on to you and Mary as soon as we receive them.

Best,

Ali Tope

Housing Program Manager
Community Action Council
3020 Willamette DR NE
Lacey, WA 98516
360-438-1100 ext 1124
Cell: 253-548-5846
Fax: (360) 491-7729
Email: Alit@CACLMT.org

From: Dodge, Kathryn (COM) [mailto:kathryn.dodge@commerce.wa.gov]
Sent: Wednesday, November 3, 2021 2:39 PM
To: Thomas Webster <thomas.webster@co.thurston.wa.us>; Baldwin, Mary (COM) <mary.baldwin@commerce.wa.gov>
Cc: Ali Tope <AliT@caclmt.org>; Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Subject: RE: Language that supports By and For Category being used for financial assistance
Importance: High

Hi Thurston team,

Sorry for the delayed response here. Just to clarify, when we talked about this previously we hadn't reached a definitive decision yet. I recall letting you know we would explore this more and get back to you. We were able to talk about this as a larger team and have some additional info.

The intention of By and For funds was to have them be used *by* the By and For organization themselves. I'm sorry this wasn't clear in the guidance. We felt that if they were to be used by another agency, *on behalf of* the By and For organization, that wouldn't meet the intention. We hear you that the By and For agencies might not always have the capacity to administer rent assistance themselves and how cutting checks on their behalf could be a useful strategy to ensure the funds are utilized.

That being said we can explore this strategy you're proposing. We need a couple things in order to move forward. You can have the organizations provide this to Mary and I directly, or send us the statement they provide you. Please send it in writing.

1. Confirmation that the By and For org(s) feel they will not utilize the full amount available in the By and For subcontracting budget category with the activities currently taking place.
2. Confirmation that they would rather have the CAC administer the financial assistance for the households they refer, as opposed to the By and For organization administering the assistance themselves.

Let me know if you have questions.

Take care,

Kathryn Dodge (she/her/hers) | PROGRAM MANAGER

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Monday, October 25, 2021 9:53 PM
To: Baldwin, Mary (COM) <mary.baldwin@commerce.wa.gov>; Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Cc: Ali Tope <AliT@caclmt.org>; Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Subject: FW: Language that supports By and For Category being used for financial assistance

External Email

Mary and Kathryn –

Following up on our discussion last week when we were advocating with CAC to allow payments being made on behalf of By and For Organizational applicants, I'm following up with language from Commerce FAQs and Guidelines that CAC

researched that we think supports the ability of this funding to be charged to the By and For Line item. We appreciate your support in having Commerce take the position of allowing this use of the By and For Funds.

Regards
Tom

The following comes from the language from the updated FAQs and Guidelines that just came out on Friday.

-TRAP Guidelines Version 1 and 2, section 7.2 states "Funds provided to sub grant to By and For organization/s can cover the costs associated with program outreach and assistance to marginalized communities. This can include acting as a referral source, outreach to marginalized communities, providing rental assistance to households directly, or other Operations activities related to T-RAP."

-FAQ Version 4 Page 2 states "Is there 10% admin and ops built into the By and For category? No, there is no admin and operations cap in this budget category. The By and For Subgrants budget category can cover any allowable T-RAP expenses (Section 4 of guidelines)." – Section 4 is Rent and Utilities.

FAQ Version 5 page 2 states "Updated 10/2021-Is there 10% admin and ops built into the By and For category? For both T-RAP 1.0 and 2.0, the By and For organization's admin expenses cannot exceed 15%."

-FAQ Version 4 page 4 state "Can my By and For subgrantee use their By and For budget category on indirect expenses? No, the By and For budget category can be used for all expenses except indirect. This budget category cannot be used for indirect because it is comprised of CARES Act funds which do not allow indirect. If you are using this category for financial assistance (rent, utilities, other housing expenses), it does not need to be reported on the Monthly Report Form because this category consist of CARES act funds." – This implies that we can use this category for financial assistance we just wouldn't have to report on it.

FAQ version 5 page 4 states "Updated 10/2021-Can my By and For subgrantee use their By and For budget category on indirect expenses? For T-RAP 1.0, no. For T-RAP 2.0, yes. If the By and For grantee is using this budget category for financial assistance (rent, utilities, other housing expenses), it does not need to be reported on the Monthly Report Form because this category consist of non-Treasury specific funds."

Scope of Services Exhibit B in our TC Com 1.0 contract states "Subrecipient may provide funds to "By and For" organizations in accordance with Program Guidelines for marketing, application in-take and processing, and rent payments, as appropriate. Subrecipient will provide oversight to ensure compliance with program guidelines by subcontracted organizations and all partner organizations."

We feel that the decision to not let us use the By and For line item for financial services for applications done by Innovations and Cielo directly goes against the contract, guidelines, and FAQs. It indicates that the language and intent for this category is performative only. What will end up happening is that we will be forced to give back the By and For category funding not because we can't spend it, but because we are not being allowed to. This is truly damaging to the work that our By and For organizations are doing.

Kirsten York

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Friday, August 7, 2020 7:37 AM
To: Kirsten York; Katrina Kahler-Wilson; Kathryn Cooper; Keylee Marineau
Subject: FW: Eviction Rent Assistance Program Application - Thurston County

FYI – See the answer from Commerce on the use of MOUs.

Tom

From: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Sent: Thursday, August 6, 2020 5:23 PM
To: Thomas Webster <thomas.webster@co.thurston.wa.us>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Hi Tom, we just heard back from our contracting office on this. You can use an MOU as long as all terms and conditions of the contract are passed on in the document.

Kathryn Dodge (she/her/hers) | GRANT MANAGER

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Thursday, August 6, 2020 11:50 AM
To: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Thanks Kathryn –

I think an MOU is a really efficient way to go when we are partnering with organizations to help with outreach and accepting applications (put not making rent payments), as it allows us to work with lots of organizations on a fee based approach rather than doing sub-contracts that take more time to implement and are harder to manage, so any leeway Commerce can provide on this would be appreciated.

Tom

From: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Sent: Thursday, August 6, 2020 11:31 AM
To: Thomas Webster <thomas.webster@co.thurston.wa.us>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Our contracting office doesn't typically allow MOU's when funds are passed down, but we're following up with them on this one because many grantees are asking about this. I will let you know as soon as I hear!

Kathryn Dodge (she/her/hers) | GRANT MANAGER

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Thursday, August 6, 2020 10:36 AM
To: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Kathryn –
One more follow up question on working with partners and By and For Organizations.

Does Commerce have any guidance/requirements on the use of MOUs as a sub-contract vehicle? CAC is interested in using MOUs with partner organizations and By and For Organizations around marketing/outreach and application intakes for the program. The MOUs would lay out how organizations are paid/compensated for this work. As long as the requirements of the grant flow down to the organizations that sign the MOU, does this approach cause any problems/concerns for Commerce?

Thanks
Tom

From: Thomas Webster
Sent: Thursday, August 6, 2020 10:23 AM
To: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Thanks Kathryn –
Regarding the By and For organizations, our intent is to provide funding to CAC and require them to sub-contract with By and For Organizations. They are reaching out to these organizations to see if they are interested in participating. We are also reaching out to the Tribes and a few other orgs that we think may qualify as By and For Organizations. Depending on the responses they received from these organizations, we may need to request an exception. I expect it will take a week or so to get that sorted out.

Do we need to have the By and For details finalized before you contract with us for those funds? If so, we would appreciate getting 95% of the contract as soon as possible and the rest once the By and For orgs have been finalized.

Tom

From: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Sent: Thursday, August 6, 2020 10:13 AM
To: Thomas Webster <thomas.webster@co.thurston.wa.us>
Subject: RE: Eviction Rent Assistance Program Application - Thurston County

Hi Tom, no worries you are not bothering me!

I can release your contract this week, but just need to know the status of the By and For requirement. There are these 4 organizations in Thurston listed in the draft list on the application:

Innovation HTC
Partners in Prevention Education
Pizza Klatch
Stonewall Youth

We can move forward with contracting 95% of the contract total and amend the contract adding the other 5% at another time.

Let me know how you'd like to proceed!

Kathryn Dodge (she/her/hers) | GRANT MANAGER

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Thursday, August 6, 2020 8:55 AM
To: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Subject: FW: Eviction Rent Assistance Program Application - Thurston County

Hi Kathryn –

Sorry to bother you, but just wanted to check to see when we might expect to get our ERAP contract back from Commerce. Will it be this week? We have are ready to move forward with contacting with CAC to carry out this work, but want to have our Commerce contract in place first. Thanks.

Also, we have a few other random questions about the program:

- 1) Do you know when the start date for the program will be? (Wondering if CAC will be able to get paid for work they are doing getting the program set up)
- 2) As I mentioned, we intended to have CAC serve as our lead agency to implement the program. CAC also owns rental properties in the County. Are there any limitations to tenants in CAC properties receiving these funds?

Thanks
Tom

From: Thomas Webster
Sent: Friday, July 31, 2020 5:15 PM
To: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Cc: Schelli Slaughter <schelli.slaughter@co.thurston.wa.us>; Ramiro Chavez <ramiro.chavez@co.thurston.wa.us>; Keylee Marineau <keylee.marineau@co.thurston.wa.us>
Subject: Eviction Rent Assistance Program Application - Thurston County

Kathryn,

On behalf of Thurston County, attached please find our application for the Eviction Rent Assistance Program, as well as a scan of the signed signature page.

We are excited about the opportunity to utilize these funds in our community to provide assistance to those face possible eviction. Please let us know if you have any questions or need additional information from us at this time.

Regards
Tom

From: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Sent: Tuesday, July 28, 2020 1:08 PM
Subject: New Eviction Rent Assistance Program Application
Importance: High

To: CHG Lead Grantees

Below is a flurry of new information regarding the ERAP program. Please read carefully and contact me with any questions!

Today we are releasing an application and supporting materials for the new CARES Act funded Eviction Rent Assistance Program (ERAP). This program is effective August 1, 2020 through December 31, 2020.

The ERAP Grant is intended to prevent evictions by paying past due, current due and future rent, while targeting limited resources to those with the greatest needs and working to distribute funds equitably.

As many of you know, this program was assigned to Commerce in July and we have been working quickly to develop Guidelines and Forms (thanks for all of the great feedback during the comment period.) We feel good about the information and materials going forward and know there may still be need for improvement. The scope of work won't change, but the "how" may be flexible. Don't hesitate to send comments our way.

Update to initial Guidance

At this time, rent assistance is limited to three months. This can be any combination of arrears, current or future rent. If this changes, the ERAP Guidelines will be updated and grantees immediately notified.

Application and Due Date

Attached to this email is the ERAP Application. It's due – ASAP, yes, ASAP. As soon as you get it to me, I will turn a contract around so you can move forward with implementation.

Program Goal & Requirements

A primary goal of this program is to promote equity in who is served, with a focus on equity for groups of people who historically have not been provided equitable access to rent assistance and those who have disproportionately been impacted by the COVID-19 outbreak. Latinx or Hispanic, young adults, Black or African American, American Indian and Alaska Native, Native Hawaiian or other Pacific Islander.

To meet this goal, you are required to sub contract at least 5% of your award to what we are calling a By and For Organization (or several organizations depending on the size of your county.) Our intent is that you contract with them to do outreach in their communities, help people understand the program and complete paperwork. You are not restricted to 5% and can also contract with them to administer the rent assistance directly. Check out the ERAP Guidelines for more information. You can find a list of some of the By and For Organizations we know about in the Application.

Commerce is also sending a letter to our draft By and For list plus a larger statewide list of nonprofits today alerting them to the new program. Our goal is that they know about the new rent assistance and can start outreach in their communities.

Performance

Grantees are only authorized to spend 50% of funding until Commerce can confirm grantees are ensuring equitable access to the program.

Equitable access means that the race and ethnicity of people entering ERAP are similar to the community demographics. Equitable access is measured by comparing the percent of people in poverty by race and ethnicity to the percent of people entering ERAP by race and ethnicity.

The percentage of head of households provided rent assistance must at least equal the proportion to the population living in poverty in the county for each of the following groups:

- ✓ People of Color (includes Black or African American, American Indian and Alaska Native, Native Hawaiian or other Pacific Islander, Hispanic/Latinx, Asian, Other/Multi-Racial)
- ✓ Black or African American
- ✓ American Indian and Alaska Native
- ✓ Hispanic/Latinx

Data from all ERAP grantees in the county will be combined for the purpose of performance measurement and performance monitoring.

Program Guidelines and Forms

You can find the Program Guidelines and required Forms on our website [here](#). We are having several of the forms translated into Spanish, Vietnamese, Chinese, Korean, Russian and Tagalog. They will be up posted in the next few days. Additionally, we created sample forms, written instructions and a video to help explain how to complete the documents. They will also be on the same website shortly.

Kathryn Dodge (she/her/hers) | GRANT MANAGER

Office of Family and Adult Homelessness | Washington State Department of Commerce

1011 Plum St SE

PO Box 42525

Mailing address

Olympia, WA 98504

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Kirsten York

From: Ali Tope
Sent: Wednesday, April 13, 2022 3:33 PM
To: Kirsten York
Subject: FW: T-RAP Prioritization Methods
Attachments: ERA-FAQ-8-25-2021.pdf

From: Ali Tope
Sent: Wednesday, April 13, 2022 8:32 AM
To: Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Subject: FW: T-RAP Prioritization Methods

Hi,

This shows that on 7/1/21, Kathryn Dodge sent an email about prioritization method and it says AND. It also shows that Tom approved it and sent it to commerce.

I've also attached the TREASURY FAQ's that state the following sentence "Grantees should establish a preference system for assistance that prioritizes assistance to households with incomes less than 50 percent area median income8 and to households with one or more members that have been unemployed for at least 90 days. Grantees should document the 8 For the definition of area median income, see FAQ 4 above. 12 preference system they plan to use and should inform all applicants about available preferences. Treasury will require grantees to report to Treasury on the methods they have established to implement this prioritization of assistance and to publicly post a description of their prioritization methods, including on their program web page if one exists, by July 15, 2021.

The words grantee actually indicates that Thurston county is responsible for putting the prioritization method on their website. [Coronavirus Rent Assistance \(thurstoncountywa.gov\)](https://www.thurstoncountywa.gov)

Their website does not have the correct eligibility requirements for trap 2.0

It does not have the prioritization method

It does not have the information by contract that states that the funding source is department of treasury and department of commerce.

The flow chart and checklist are incorrect.

Ali

From: Thomas Webster <thomas.webster@co.thurston.wa.us>
Sent: Wednesday, July 14, 2021 7:22 AM
To: Katrina Kahler-Wilson <KatrinaK@caclmt.org>; Elisa Sparkman <elisa.sparkman@co.thurston.wa.us>
Cc: Michele Baumgart <MicheleB@caclmt.org>; Ian Bishop <ianB@caclmt.org>
Subject: RE: T-RAP Prioritization Methods

Katrina – thanks for all this info. This looks like what Commerce asked for and I'll pass it along to them.

Tom

From: Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Sent: Wednesday, July 14, 2021 7:03 AM
To: Thomas Webster <thomas.webster@co.thurston.wa.us>; Elisa Sparkman <elisa.sparkman@co.thurston.wa.us>
Cc: Michele Baumgart <MicheleB@caclmt.org>; Ian Bishop <ianB@caclmt.org>
Subject: FW: T-RAP Prioritization Methods
Importance: High

Hi Tom,

Per my conversation with Michele, the county and CAC agreed during a meeting in the beginning of this program to prioritize individuals that were 50% AMI at or below. We have 86% of the applicants to date that met this criteria. This prioritization was completed during the scheduling phase of the program. Our scheduler was the tool we used to prioritize.

We are making updates to the scheduler that will happen hopefully by the end of the week. They are as follows:

Emergency/Prioritization Appointments

1. Individuals at or below 50% AMI
2. households with one or more individuals who are unemployed and have been unemployed for 90 days before their application date
3. Individuals that are participating in ERPP

We can talk more about this at our 830 today.

Thank you,
Katrina

From: Michele Baumgart
Sent: Tuesday, July 13, 2021 8:22 AM
To: Katrina Kahler-Wilson <KatrinaK@caclmt.org>
Subject: FW: T-RAP Prioritization Methods
Importance: High

Here is the email from Tom.

From: Thomas Webster [<mailto:thomas.webster@co.thurston.wa.us>]
Sent: Monday, July 12, 2021 4:05 PM
To: Elisa Sparkman <elisa.sparkman@co.thurston.wa.us>; Michele Baumgart <MicheleB@caclmt.org>
Subject: FW: T-RAP Prioritization Methods
Importance: High

Elisa and Michele –

Had you seen this request from Commerce to send them our T-RAP prioritization methods by Wednesday? I don't believe we went these to Commerce yet, but please correct me if I'm wrong. If not, Michele, could you send me a brief write-up of your current policy. I believe you are reserved 50% of appointments for prioritized populations, but want to confirm.

Thanks
Tom

From: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Sent: Thursday, July 1, 2021 5:09 PM
To: Cody Francis <cody@pofcn.org>; lea@pofcn.org; kate.speltz@kingcounty.gov; Kathryn Cooper

<kathryn.cooper@co.thurston.wa.us>; Kimberly <Kimberly.Dodds@kingcounty.gov>; Kirsten Jewell <kjewell@co.kitsap.wa.us>; Lea <lea@pofcn.org>; Leslie@wagap.org; linda.greenway@kingcounty.gov; Lori Call <lori@wagap.org>; mrdavis@spokanecity.org; stephanie.bray@piercecountywa.gov; Todd Parker <TParker@co.mason.wa.us>; Thomas Webster <thomas.webster@co.thurston.wa.us>; Valeri Knight <valeri.knight@piercecountywa.gov>; zabrina.minor-gregg@kingcounty.gov; nmakhani@kingcounty.gov; Katrina Kahler-Wilson <KatrinaK@caclmt.org>

Subject: T-RAP Prioritization Methods

Importance: High

Hello grantees!

As you know, Treasury requires T-RAP grantees to prioritize households with:

1. an income at or below 50% Area Median Income (AMI), and
2. households with one or more individuals who are unemployed and have been unemployed for 90 days before their application date (Section 2 of [T-RAP guidelines](#)).

Treasury is requiring grantees to publicly post a description of their prioritization methods **by July 15, 2021** (see #22 in [Treasury FAQ](#)). To meet this requirement, **please send me your prioritization method by Wednesday, July 14 so that we can add it to our [rent assistance providers list](#) that is already publicly available on our webpage. If the prioritization methods aren't already listed on your local rent assistance webpage, please add them here as well.** We understand this may take some time, so the first priority is to send them to me to add to our [webpage](#).

An example of a common method is ensuring that at least 60% of the T-RAP applications that are processed are for households who meet these two criteria.

Remember, per the required T-RAP policies and procedures (Section 8.2.1.4 of the [T-RAP guidelines](#)), grantees must document their policies and procedures for determining a household's eligibility to include policies and procedures for determining the prioritization of households in compliance with the statute and maintain records of their determinations.

Thank you for your hard work on this program and your partnership with us,

Kathryn Dodge (she/her/hers) | PROGRAM MANAGER
Office of Family and Adult Homelessness | Washington State Department of Commerce
1011 Plum St SE
PO Box 42525
Mailing address
Olympia, WA 98504

Cell: 360-764-9682

www.commerce.wa.gov | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Subscribe](#)

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

Kirsten York

Subject: CAC Monitoring Debrief
Location: Microsoft Teams Meeting

Start: Tue 1/4/2022 3:00 PM
End: Tue 1/4/2022 4:00 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Brandon Weber

-----Original Appointment-----

From: Brandon Weber <brandon.weber@co.thurston.wa.us>
Sent: Monday, January 3, 2022 12:21 PM
To: Brandon Weber; Sarah Miranda; Katrina Kahler-Wilson; Ali Tope; Sharrie Shumway; Thomas Webster; Suzette Smith; Kirsten York
Subject: FW: CAC Monitoring Debrief
When: Tuesday, January 4, 2022 3:00 PM-4:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

-----Original Appointment-----

From: Brandon Weber [<mailto:brandon.weber@co.thurston.wa.us>]
Sent: Wednesday, December 29, 2021 10:43 AM
To: Brandon Weber; Thomas Webster; Suzette Smith; Kirsten York
Subject: CAC Monitoring Debrief
When: Tuesday, January 4, 2022 3:00 PM-4:00 PM (UTC-08:00) Pacific Time (US & Canada).
Where: Microsoft Teams Meeting

Hi Kirsten,

Please let me know if this time doesn't work for you and your team.

Thanks,
Brandon

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Or call in (audio only)

[+1 469-518-1640](tel:+14695181640),474211042# United States, Dallas

Phone Conference ID: 474 211 042#

Appendix E



THURSTON COUNTY
WASHINGTON
SINCE 1852

COUNTY COMMISSIONERS

Carolina Mejia
District One

Gary Edwards
District Two

Tye Menser
District Three

PUBLIC HEALTH AND SOCIAL SERVICES DEPARTMENT

February 18, 2022

Ramiro Chavez, PE, PgMP
Interim Director
Dimyana Abdelmalek, MD, MPH
Health Officer

Kirsten York
Chief Executive Officer
Community Action Council of Lewis, Mason and Thurston Counties
3020 Willamette Dr. NE
Lacey, WA 98516

Dear Ms. York,

Thank you for your response provided on February 14, 2022 to Thurston County's Monitoring Report of Community Action Council of Lewis, Mason and Thurston Counties' (CACLMT) Treasury Rent Assistance Programs (T-RAP). As next steps, CACLMT's response has been shared with the County's Internal Audit Committee (IAC) and the Board of County Commissioners (BoCC) will be briefed on Wednesday, February 23rd on the results of the monitoring and your response. Following this briefing to the BoCC, the County will notify CACLMT of any actions or next steps the County will take regarding the recommendations in the Monitoring Report and CACLMT's response. At this point, the County will consider the monitoring report finalized and all relevant documents will be subject to public release. As the County has received a public records request regarding this monitoring report, the County is required to release all relevant materials, including the Monitoring Report and CACLMT's response.

Regarding the report, I, as manager of the Office of Housing and Homeless Prevention (OHHP), have been engaged with county management regarding the content of the Monitoring Report and support the recommendations. I have worked with CACLMT in good faith to implement a rent assistance program in compliance with program requirements, which requires a level of trust that CACLMT will fulfill its responsibility to prevent fraud and ensure that funds are used on eligible purposes. This is especially important when suspected fraud has come to the attention of CAC. Every dollar that goes to an ineligible application, is a dollar that doesn't go to an eligible family in Thurston County.

As you are aware, Thurston County has an obligation and responsibility to monitor sub-recipients to ensure compliance with program requirements and that public funds are spent on eligible activities. For the T-RAP programs, we recognize that CACLMT has stood up a large program in a short-period of time amongst a program that had developing and evolving program guidance from the U.S. Department of Treasury and the Washington State Department of Commerce. We conduct monitoring in a spirit of partnership to identify areas where program compliance can be strengthened and expect sub-recipients to be open to addressing recommendations on strengthening compliance.

CACLMT has been a valuable partner in Thurston County in implementing the T-RAP rent assistance programs along with many other programs for those experiencing homelessness and other low-income families in our community. We will keep you posted on the next steps the county will take to resolving the recommendations in the Monitoring Report.

Regards,

A handwritten signature in black ink, appearing to read "Tom Webster", with a stylized flourish at the end.

Tom Webster
Program Manager, Office of Housing and Homeless Prevention

cc: Ramiro Chaves, County Manager
Brandon Weber, Internal Auditor

Appendix F



Community Action Council of Lewis, Mason & Thurston Counties

Grievance Regarding Thurston County Monitoring of CACLMT's Treasury Rent Assistance Program Contracts

Community Action Council of Lewis, Mason & Thurston Counties (CACLMT) is filing this formal grievance in regard to the Monitoring performed by Thurston County Public Health and Social Services, conducted in December 2021 and January of 2022, resulting in an ERA Monitoring Letter with four *recommendations* (not findings) dated January 24, 2022.

These concerns are being brought forward due to the unprecedented, irresponsible actions and questionable ethics displayed by Thurston County Public Health & Social Services Housing staff and leadership. CACLMT is concerned TCPHSS may apply discriminatory eligibility factors and may compromise confidentiality of client data given the focus and comments staff made during this monitoring and over the last year. CACLMT is further concerned Thurston County Public Health and Social Services has publicly attacked the reputation of CACLMT without substantiating evidence through a press release and social media postings in order to further damage the reputation of CACLMT and garner support for transitioning this contract to another provider or entity. Such action may cause serious, long-term, damage to all of the programs run by CACLMT. There were no findings made against CACLMT in this monitoring. Yet, County staff intentionally represented to the media and public that it had made findings of suspected fraud. The wording chosen by the audit staff suggested the suspected fraud was perpetuated by CACLMT rather than third party individuals applying for services.

- In August of 2021, Program Manager Tom Webster required CACLMT to attend a sales presentation by a for-profit group who aggressively demanded our data and information so they could develop a plan to provide TRAP services. We were told by the County staff that we were required to attend the presentation or we were in jeopardy of not receiving any County funding in the future. This is concerning that TCPHSS has an interest in utilizing for-profit agencies to administer state and federal funds for housing assistance.
- The County required CACLMT to mandate a two week time limitation for applicants to attend an appointment or we would be out of compliance. This artificially hindered the provision of services to clients who were not able to meet this short timeline. This hindered our ability to give appointments to DRC clients to stave off unlawful detainer during the moratorium.
- Monitoring by the County was not included contractually for this funding. Despite this, CACLMT cooperated fully with the process. Yet, the specific Monitoring performed in December and January lacked the formality and transparency of the County's normal process, did not include a proper scope of data gathering, and was labeled as a "review", "monitoring", and later an



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“audit” inconsistently through varying forms of communication. The details of the monitoring report were released to the public prior to CAC’s debrief with the County and prior to the document being final and public. No exit interview was conducted for what the County is now telling the media was an official audit; and no opportunity was provided to CACLMT for an interactive discussion about the future of the contract before the suspension was issued. In addition, the County audit staff referenced updated policy guidance as of December 2021, and then made policy alignment judgements retroactively.

- Unethical and biased behavior was displayed by the County Auditor staff based upon the following written and verbal interactions and communications:
 - o The County staff performing the Monitoring, in their own words, – “judgmentally selected” – the specific files they reviewed. This was not a random sampling of applications. 20 of nearly 4,000 household files were chosen for review; only two of the five household files referenced resulted in final payment to a landlord on behalf of a client and met all eligibility requirements for funding.
 - o Client files were selected subjectively based upon anecdotal perceptions of eligibility by the County staff, rather than any standardized practice. (i.e. selecting a household that had no income, a household with no corresponding utility assistance request alongside one for rental assistance, a file where a landlord’s communication with CACLMT seemed more than “normal.”)
 - o Over 50% of the files selected were clients working with By and For organizations.
 - o Staff performing the Monitoring made disconcerting remarks such as: “How could clients afford this rent? I could not afford this amount of rent.” Staff said in the line of the work that the individual was doing, how could they afford a 2500 square foot house? At one point staff said, “I want to ask these people how they can live without any income.”
 - o County staff performed internet searches for a business because they believed a Hispanic company employee’s pay stubs “looked fake.” He stated he did not think the company existed. They ultimately found the company to be legitimate.
 - o County staff used access to county databases, not regularly available to CACLMT, to investigate a client’s occupancy report for the address listed in their application.
 - o County staff spent hours interrogating CACLMT staff regarding policies and practices far beyond typical standards for a Monitoring.

- CACLMT believes the County Manager conducted this “investigation” under the guise of a Monitoring and released personally identifiable client information to local law enforcement to pursue criminal investigations against clients suspected of fraud. This raises concerns about whether the constitutional rights of the criminal suspects may have been violated by the audit



Community Action Council

of Lewis, Mason & Thurston Counties

staff

accessing information without a valid search warrant and providing it to the Sheriff without evidentiary basis for possible criminal investigative purposes. This also will have a chilling effect on future clients and marginalized communities seeking services. We have already had clients reach out to us to ask if they were one of the households reported to law enforcement.

- CACLMT is now in a very difficult position. We want to be in compliance and work to get services restored; however, we are gravely concerned about providing client information if there is a plan to continue to provide this confidential data to the Sheriff for possible criminal prosecution. The County staff are informing the public that the delay in services is the fault of CACLMT, but not informing them that they are not providing any funding to support continued work on the contracts or any assurance that the confidential information will not be used for improper purposes.
- County staff did not complete the normal policies and practices at the conclusion of the Monitoring and subsequently suspended the contract with CACLMT with no notice. CACLMT reasonably requested written clarification of the recommendations they were making as they were inconsistent with past County practices and the County staff refused to respond or engage in a productive discussion. Rather, they summarily suspended the contract with no notice in a very public and detrimental manner to the complete surprise of CACLMT. The decision of contract suspension was done during a time when only two of the three County Commissioners were able to be present for the discussion.
- Thurston County Public Health and Social Services had no interim plan in place to ensure there would be no interruption of services to CACLMT clients. This is irresponsible and CACLMT is having to try and address questions from clients with no answers about how or when services will be reinstated. CACLMT believes County staff are not adequately staffed to handle the service requests in the interim and the quality and ability of providing services will greatly decrease.

Community Action Council of Lewis, Mason & Thurston is deeply alarmed and disappointed in the actions taken by the Thurston County Public Health & Social Services Housing staff and leadership. The disregard shown, by all of those involved with the County's decisions, for the safety and welfare of the vulnerable individuals and families that CACLMT has worked to support and protect for over 50 years is staggering. CACLMT has always focused on maintaining the highest standards of ethical practice and will continue to do so in order to maintain the confidence and trust of our partners and the communities we serve.

Appendix G

Notes on Grievance Meeting with TCPHSS 3/24/22

In Attendance: Kirsten York, Tee Walton, Katrina Kahler-Wilson, Tom Webster, Brandon Weber (all via Zoom)

Tom opened the meeting by expressing the purpose of the time together was to discuss the grievance as it relates to the contract, and the specifics details in which CAC believed was grounded in the contract. In addition, to hear what CAC believed a resolution could look like. Tom expressed that he could not speak on behalf of the BOCC and the County Auditor.

Tom asked, based upon our grievance, how we concluded that there was no monitoring clause on our contracts as they identified the clause 15 in the TRAP 2 contract. I asked to take time to review before answering.

I asked Tom if the recommendations as outlined in the monitoring report were in line with the policies, procedures, and practices being approved and recommended from him and his team up until the point of the monitoring. Tom stated he did believe the contract recommendations were in line with his guidance up to that point. I then asked why then these recommendations couldn't be put in writing in our contract to ensure agreeance between TC and CAC with the approval from Commerce that these recommendations were in alignment with the intent of the program. No answer, Tom took notes.

Tom expressed that the intent of the monitoring was to provide clarification in order to enhance the future of the contract be successful, not necessarily to speak to issues or concerns about the contract as it ran previously. I responded by then asking why it would then be a concern to put those items in writing in order for CAC and the County to be clear on how to successfully implement the program to enhance our ability to comply. I stated that the letter I wrote on the 14th of February said exactly those things that we would be happy to sign an amendment with this information in order to ensure CAC knew how be in successful compliance. Tom expressed that the BOCC's felt my letter expressed a disinterest in taking the recommendations seriously. I said I was disappointed to hear that as intent of the letter, again, was for clarification and transparency on behalf of our contracts.

Brandon then expressed that for what it was worth, face to face meetings are the standard practice vs. writing letters and they prefer having a conversation vs. written letters and emails. I stated we expressed our concerns during our meeting in January, and my letter on the 14th was to request clarification, after which the next communication from the County was a finalization of the report and suspension with a press release directly after.

Tee then asked if he could present a question. He asked why the County suspended our contracts and then immediately put out a press release about CAC committing fraud without communicating with us first. Tom acknowledged he wasn't the one who sent out the press release. And the County didn't say that CAC committed the fraud, that the applicants committed fraud.

I expressed that the press release, and subsequent conversations with the media after that point, painted the picture to the public that CAC DID commit fraud and it has undermined the 50+ reputation of our organization with funders, partners and providers. Our organization provides services beyond housing and it has jeopardized the trust all other funding streams had in our organization. We are being

questioned and scrutinized because of their public campaign against CAC. Tom acknowledged they did not come to CAC and communicate about the press release.

I asked why then, if the County's stance was NOT that CAC committed fraud, I would like a response to under what grounds they suspended our TRAP contracts. And they rescinded the 1277 contract with no notice, no explanation after CAC was the top scoring applicant of all RFP candidates? Tom stated he couldn't speak to the 1277 contract at this time. I told him we would be filing a grievance for that contract decision also, which he would be receiving shortly.

I asked if Commerce had approved the recommendations in which were outlined in the report. Brand expressed that he and the County had been in consultation with Commerce for months before the monitoring with Kathryn and Kathy – to discuss in depth the program policies. And up to that point, they did not express any concerns about how the County had been implementing the program, nor issues with the recommendations. That Commerce didn't have any specific issue with the recommendations. Tom stated the County was being monitored by Commerce and they will have more information about it next week. He then encouraged us to speak directly with the Commissioners about these concerns, that face to face meetings would be ideal and speaking to them directly would be something important for CAC to do. He understood our Board rep had scheduled meetings with the Commissioners.

Brandon expressed that in all of the 15+ years in which he had been a monitor, he has never seen a level of detail in policy that we were requesting in all of the hundreds of contracts he has reviewed. I expressed that we had different experiences with contracts.

Tee expressed his concerns that the County has harmed CAC and all the good work our organization has done for over 50 years. He expressed that there were folks who wanted to express their frustration with the County and because Kirsten, our CEO, has set the tone – we have handled the county with kindness and professionalism.

I stated that the County has not only undermined our reputation, they have also undermined our clients trust and security in the safety of their information when they are accessing services from our organization. I am concerned at the long term impacts of these actions by the County.

Tom asked if we had any closing thoughts. I stated in transparency, we would like to have him respond to the questions as asked about the recommendations and putting them in writing.

Tom expressed the next steps would be he would be his final decision in writing within 15 days, although likely earlier. He encouraged CAC that the next step would be to have a conversation with Mary Hall as she has now been given over the monitoring and she was in charge of it. He said that face to face interactions were much better than letters and emails. That tone in letters can be difficult to read.

We thanked the County staff for attending and giving us the opportunity to discuss this matter. Tom expressed his hope that we could repair our relationship, and acknowledged he understands it may never be the same, but hopes for a resolution.

Appendix H



Community Action Council MINUTES

TCPHSS / CACLMT Resolution Meeting

March 29th, 2022

12:00PM-12:30PM

3020 Willamette Drive NE, Lacey WA 98516 via ZOOM

In Attendance: Debbie Sullivan, Kirsten York, Heather Leidner, Tee Walton, Ali Tope, Sarah Miranda

TCPHSS Representative : Tom Webster

Meeting began at 12:01PM.

Kirsten York brought forward an offer of resolution between Community Action Council of Lewis, Mason and Thurston Counties and Thurston County regarding the four T-RAP contracts that are currently suspended.

Tom Webster states that there will be an Executive Board meeting tomorrow to discuss this situation on the counties part.

Kirsten offered written statement and meeting minutes regarding this meeting so that the County would have all appropriate information before the session begins tomorrow. Tom stated understanding.

Kirsten states understanding that the county will be moving forward with the For Profit Vendor LiveStories, she states that CACLMT would like to move forward from this situation. She states CACLMT's intention to terminate these (T-RAP) contracts with Thurston County Public Health with ten days' notice per our Contract Clause allowing the county to move forward with their contracts with other entities.

CACLMT recognizes the teamwork that has been done and are honored to have served the community with this contract.

Kirsten reflected that in the grievance meeting it became clear that there may have been a misunderstanding regarding the press release by the county and press contact and its impact with CACLMT.

CACLMT would like to offer to cease the grievance process going forward and not appeal the findings of the county regarding the grievance. CACLMT asks that the county release a public statement of support of CACLMT and Thurston Counties continued confidence in the business practices and client services to the community. This will allow CACLMT to move forward with our reputation in tact.

CACLMT would agree any additional conversations regarding this situation would be between CACLMT and Thurston County entities and not within the media.



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Tom stated that he feels that these actions seem reasonable based on his perspective.

Tom had a follow up question regarding trying to seek resolution of the monitoring. Is there interest or desire from CACLMT to continue conversations with the county around any ongoing monitoring.

Kirsten stated her understanding was the monitoring report was final.

Tom stated he does believe that it is final but that the Auditors office (Mary Hall) may request a “deeper dive audit” and that there may need to be additional conversations around next steps related this. He questioned whether there are additional actions that CACLMT would be interested in taking regarding that monitoring.

Kirsten stated that if there is additional information required of CACLMT, the agency would need to be formally informed of such. As of this meeting there has not been notification regarding any additional monitoring or audits. Kirsten states that unless there is a requirement regarding external auditing by the funding source, she does not feel it would be necessary to participate in a further audit or monitoring as that the County will have all information, spreadsheets, and client data regarding these contracts per the information exchange currently happening with the county and CACLMT. She states that the County will have full record and that if there needs to be additional information and data related to an external audit itself that would need to be addressed in the future.

Tom states that there may be follow up regarding the actions of the Auditors office and that he would not be able to address that. Tom states that the Auditor is an independent elected official with her own authority which means that he is not necessarily aware of next steps or reports that Mary Hall may have regarding any continued monitoring audit of the data.

Kirsten requests further information regarding this and whether it would be pursued by the auditor’s office so that CACLMT will have adequate representation regarding moving forward.

Tom states that he can request additional clarity from the board and Mary Hall at the meeting being held 3/30/2022.

Tom Webster requested clarification about what CACLMT would like included in any public release regarding the agency and the county. Kirsten agreed to present that information to Tom by e-mail. Minutes of this meeting will also be sent to Tom.

Kirsten stated that CACLMT’s intention is to message this as the separation of identities and that CACLMT was honored to do the work for the housing needs of Thurston County residents and would like to continue to be a good partner to Thurston County.

Tom stated that the March quarterly reports will need to be given for the Treasury. Tom stated that he continues to let the board know that CACLMT is a valuable partner for the County of Thurston and that



Community Action Council MINUTES

there is not an easy replacement for CACLMT in our county. Tom stated he feels it is important to find a way forward for the county to continue to partner with CACLMT.

Kirsten reflected gratitude and that she would like to also move forward.

Kirsten reflected that time will be applied to the contract advance and that once that is finished from March payroll the advance will be returned to the county. She stated that the hope is to get that information to the county on April 7th, but due to ongoing payroll changes this may be difficult and need an extension.

Tom requests that the expenses for TRAP 1 be fully spent out if possible for clarity regarding those contracts. Sarah Miranda (CFO) stated this would not be a possibility due to those contracts already being closed out.

Meeting ended at 12:18PM.

Appendix I



Treasury Rent Assistance Program (T-RAP) Household Information & Eligibility Form

Instructions: Use this form to screen and document household eligibility.

1. Household Information							
Household ID: <small>(cannot include personal identifying information such as initials or birth date in ID)</small>					Date:		
Name:							
Phone:				Email:			
Head of Households Age: _____				Number of Household Members: _____ Number of Household Members Under 18: _____			
<input type="checkbox"/> One or more household members are unemployed and have been unemployed for 90 days before application date.							
WA State is collecting <u>demographic data on head of households</u> assisted with this program. None of this information will be used to screen for eligibility, but instead to evaluate how equitably the funds are administered. Households do not have to answer these questions, they are optional.							
Gender:	Female	Male	Trans Male (FTM)	Trans Female (MTF)	Gender non-conforming		Refused / Don't Know
Race:	American Indian or Alaska Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	Multi-Racial	White	Refused / Don't Know
Ethnicity:	Non-Hispanic/Non-Latinx		Hispanic/Latinx			Refused / Don't Know	

2. Income Calculation

Current income must be at or below 50% AMI. Income includes all adult (18 years and older) household members and unearned income attributable to a minor. A household is one or more individuals seeking assistance together. Provider must calculate the household's total gross income for calendar year 2020 or the household's current monthly income at the time of application

If income is a fixed amount (TANF, SSDI, etc.), multiply the gross monthly amount by 12 to determine annual income.

If income is not at a fixed amount each month, (TANF, SSDI, etc.) determine the average over the last 60 days by using the following method: $\$(60 \text{ days of total income})/2 = \text{Average income} \times 12 \text{ months} = \text{Annual income}$

Household name/ household members	Source of Income <i>(see income types below)</i>	Gross Income in a pay period	Calculation method	Annual Income
<i>Example: Joey Fatone</i>	<i>wages</i>	<i>\$1,000</i>	<i>12</i>	<i>\$12,000</i>
				\$
				\$
Household Annual Income:				\$
50% AMI for household size in county:				\$

Income at or below 50% of [Area Median Income \(AMI\)](#)

Household AMI Tier

- Income below 30% AMI
- Income between 30%-50% AMI
- Income between 50%-80% AMI

Household Monthly Income (Annual Income/12):

\$

3. Income Type & Documentation

Type of income:	Check the box for income type: <input checked="" type="checkbox"/>	How to document: Grantees should request source documentation to document income. If it cannot be obtained, grantees can use a <u>written</u> self-declaration by the household. Self-declarations should be used under limited circumstances. Please use T-RAP Self-Declaration Form.
No Income		Self-declaration by household.
Wages and Income (<i>including Self Employment, Business Income, Armed Forces Income</i>)		Copy of most recent pay stub(s), W-2 or other payment statement, tax filings, profit and loss report from applicant's accounting system, or bank statements demonstrating regular income. OR
		Attestation from employer: Dated mail, fax, email or verbal verification from employer that includes name of employer, household name, pay amount and frequency, average hours worked per week, amount of any additional compensation. OR
		Self-declaration by household.
Public Assistance (<i>including but not limited to: TANF, Housing Choice Voucher, Public Housing</i>)		Determination letter/statement from another local, state, or federal government assistance program that verified the household income on or after January 1, 2020. OR
		Self-declaration by household.
Pension/ Retirement Income		Copy of most recent statement, benefit notice from Social Security, pension provider or other. OR
		Dated mail, fax, email verification or verbal verification from Social Security, pension provider, or other source that includes name of income source and income amount. OR
		Self-declaration by household.
Unemployment and Disability Income		Copy of most recent payment statement or benefit notice. OR
		Dated mail, fax, email verification or verbal verification from unemployment administrator or workers compensation administrator of former employer that includes name of income source and income amount. OR
		Self-declaration by household.
Alimony, Child Support, Foster Care Payments		Copy of most recent payment statement, notices, or orders. OR
		Dated mail, fax, email verification or verbal verification from child support enforcement agency, court liaison, or other source that includes name of income source and income amount. OR
		Self-declaration by household.

4. Housing Status

How to document: Check the box for documentation type.

- A past due utility notice or eviction notice **OR**
- Statement from the landlord that verifies the applicant's housing instability (eg: currently late on rent, has rental arrears). Verbal verification is allowable. If verbal verification, checking this box signifies provider has received verification from landlord **OR**
- Self-Declaration Form.

6. Financial Hardship

How to document: Check the box for documentation type.

- Source documentation of unemployment benefit (most recent payment statement or benefit notice). Documentation of unemployment collected for income verification is sufficient **OR**
- Dated mail, fax, email verification or verbal verification is allowable. If verbal verification, checking this box signifies provider has received verification of unemployment that includes unemployment amount **OR**
- Self-Declaration Form.

7. Lease – Rental Payment Amount & Location

How to document: Providers must collect, if available, a current lease. Obtaining a lease is not required to determine eligibility, but is an allowable way to document both the rental payment amount and the rental location. *Without a lease, rental payment amount and rental location must be documented separately.* Check the box for documentation type(s).

- A current lease signed by the applicant and the landlord or sublessor that identifies the unit **where the applicant resides** and establishes the **rental payment amount** and **tenant and landlord signature**. See Section 3.4.2 in T-RAP Guidelines for required lease components **OR**

Rental Payment Amount	Rental Address
<input type="checkbox"/> An attestation by a landlord who can be identified as the verified owner or management agent of the unit. Verbal verification is allowable. If verbal verification, checking this box signifies provider has received verification from landlord or management agent that includes where the applicant resides and payment amount.	<input type="checkbox"/> An attestation by a landlord who can be identified as the verified owner or management agent of the unit. Verbal verification is allowable. If verbal verification, checking this box signifies provider has received verification from landlord or management agent that includes where the applicant resides and payment amount.
<input type="checkbox"/> Bank statements, check stubs, or other documentation which establishes a pattern of paying rent at residence.	<input type="checkbox"/> Evidence of paying utilities for the residential unit or other documentation which establishes a pattern of paying utilities at residence.
<input type="checkbox"/> Self-Declaration Form.*	<input type="checkbox"/> Rental Address is listed on the Rent Payment Agreement Form.

**In cases where the household does not have source documentation of the rental payment amount and relies on a written self-declaration from the household, the monthly maximum amount of assistance must be 100% of the greater of the Fair Market Rent or the Small Area Fair Market Rent for the area in which the applicant resides. See Self-Declaration Form for further guidance when using for Rental Payment Amount.*

8. Utilities

How to document: All payments for utilities and home energy costs should be supported by documentary evidence. Check the box for utility arrears documentation type.

- Bill, invoice or other evidence of payment **OR**
- Self-Declaration form.

9. Other Housing Costs

How to document: All payments for housing-related expenses must be supported by documentary evidence. Check the box for other housing costs documentation type.

- Bill, invoice or evidence of payment **OR**
- Self-Declaration form.

10. Household Attestation

How to document: Grantees must require all applications for assistance to include an attestation from the applicant that all information included is correct and complete. Check the box for attestation type.

- Text, email, or other written attestation from household **OR**
- Verbal verification. By checking this box, provider is verifying they have received the verbal attestation from household **OR**
- Household signature: _____



Washington State
Department of
Commerce

T-RAP Technical Assistance Meeting

Mary Baldwin

T-RAP GRANT COORDINATOR

OFFICE OF FAMILY & ADULT HOMELESSNESS

APRIL 15, 2021

Kathryn Dodge

T-RAP LEAD

Q&A – new questions

Are verbal verifications allowed in place of signatures? Yes, verbal or electronic (email or text) verifications from the household in place of a signature are allowable when a physical signature isn't possible to obtain. Since signatures are asked for on the Self-Declaration Form, make sure your Written Self-Declaration Policy (Section 8.2.1.3 in guidelines) describes under what circumstances you will accept verbal verifications in place of signatures.

Can we do a verbal for a landlord Payment Form, or does it have to be signed? While this is at your discretion, it is best practice to gather a signature from the landlord or an email verification. If the landlord provides a verbal verification, you would want to note who you spoke to and on what date in the household's file. This is due the fact that the landlord is certifying this satisfies the arrears and no additional late charges will be accrued for that debt.



Appendix K News Release

County Commissioners

County
Manager
Ramiro Chavez

Carolina Mejia - District One
Gary Edwards - District Two
Tye Menser - District Three

FOR IMMEDIATE RELEASE: Thursday, February 24, 2022

CONTACT: Ramiro Chavez, County Manager, 360-754-2960 or email at Ramiro.chavez@co.thurston.wa.gov
Mary Hall, Thurston County Auditor, 360-786-5224 or email at Mary.Hall@co.thurston.wa.us

County Suspends Contract with Community Action Council of Lewis, Mason, and Thurston Counties

The contract suspension was due to audit findings of suspected fraud in rental assistance payments

OLYMPIA – Yesterday, Wednesday, February 23, 2022, the Board of County Commissioners, after an executive session, voted to authorize the county manager to exercise the suspension clause of the contracts between Thurston County and Community Action Council of Lewis, Mason, and Thurston Counties (CACLMT) effectively immediately, and until further notice. The county manager sent the proper notification to CACLMT today suspending all contracts.

Thurston County has reported to the State Auditor’s Office suspected fraud in rental assistance payments managed by the CACLMT.

The county passes federal and state funds to the CACLMT to provide COVID-19 emergency rental and utility assistance. The Auditor’s Office conducted regular subrecipient monitoring of the emergency rental assistance distributed by the CACLMT.

The county found a sample of four applications totaling more than \$86,000 that indicated potential fraud by the applicants. An additional two applications had been placed on hold by the CACLMT pending requests for more information. The county is taking the next steps to determine the magnitude of the potential fraud as well as working through the process to recover those funds.

“We have strong internal controls that caught these questioned payments in the course of regular subrecipient monitoring,” said Mary Hall, Thurston County Auditor. “This is an example of the audit process working.”

Hall chairs the county’s Internal Audit Committee, which also includes Thurston County Treasurer, Jeff Gadman, and County Manager, Ramiro Chavez.

“We take fraud seriously,” Treasurer Gadman said. “Protecting public resources is the highest priority for Thurston County and is why we develop robust internal controls.”

-MORE-

“It is important to note that this was discovered even during a period when we were quickly responding to the impacts of the pandemic on our community,” Chavez said. “Even in extraordinary times, the accountability, and check and balance culture at Thurston County is effective.”

Chavez added, “While this may cause a brief delay in rental and utility assistance funds for our community members, we are working as quickly as we can to have a system in place to continue to provide services to those in need.”

-30-

Appendix L

Heather Leidner

From: Cherish Cronmiller <ccronmiller@olycap.org>
Sent: Thursday, April 14, 2022 9:39 AM
To: Kirsten York
Subject: FW: ERAP follow up questions

Please see below as to Commerce's intent regarding assistance and helping people as paramount. Please feel free to share.

- -

Cherish

Office: 360.385.2571 x.6308

(Depending on availability- forwards to my cell phone)

From: Semrow, Mika (COM) <mika.semrow@commerce.wa.gov>
Sent: Friday, February 18, 2022 3:38 PM
To: Cherish Cronmiller <ccronmiller@olycap.org>; Kathy Morgan <KMorgan@olycap.org>
Cc: Dodge, Kathryn (COM) <kathryn.dodge@commerce.wa.gov>
Subject: RE: ERAP follow up questions

Hi Cherish,

I understand your skepticism, and that you are asking questions to ensure you're acting in the best interests of the organization. I also know that this approach from Commerce is, in many ways, a radical reframe of the way services for low-income people have previously been told to run. While we absolutely still want you to continue to be thoughtful and careful about the possibility that someone might defraud the program, Commerce is tempering that caution with the realities of the situations many Washingtonians are in. We are two years into a serious public health crisis, rents have risen dramatically, we have a disturbingly low vacancy rate, inflation is at an extreme, services for people—non-profit and government alike—are overwhelmed and difficult to access due to COVID restrictions, and many people have struggled to find adequate employment to cover these costs.

When T-RAP first started running, there was a lot of criticism of the program: that people were not getting paid quickly enough, that the data collection process was too cumbersome, etc. In response, there have been changes passed down by Treasury, but those were still difficult and slowing grantees down—especially in the smaller counties. We created ERAP 2.0 with a separate funding source (Coronavirus State Fiscal Recovery Funds) that has fewer requirements on it directly from Treasury than the ERA dollars, to make it easier to get the funds into the hands of struggling Washingtonians who are desperately in need of it *when* they need it—not six months down the road because they didn't have the time or money to obtain all the paperwork required, or not at all because they became frustrated and overwhelmed by the process. The approach shift that we are taking is away from, "how do we stop people from defrauding the program altogether?" to "how do we balance the risk of people defrauding the program with the reality that every anti-fraud procedure we put in place makes the funds harder to access for people who are facing eviction and homelessness?" There is not an easy answer, and no "right" answer. And grantees running the more stringent programs are still finding out that they're being defrauded—the checks that are standard practice don't even really do a great job.

All of this is to say, Commerce knows that we are asking you all to do something new with us, and we intend to support you in the ways that we can. I imagine it might feel like by giving you leeway to decide what constitute "red flags" and how you will investigate them may come across as giving you just enough freedom to set you up to fail. But I want to assure you that if you follow our guidelines, have the policy and procedure in place, there is no threat of punitive action by us, and we are working to figure out ways to cover costs for ineligible uses of funds in cases where your staff followed

policy and procedure but still didn't catch it. We're all pulling for the same outcomes, here, which is keeping people housed.

So, now to address your questions specifically:

- When rent is paid to benefit a customer of the agency (so agency is essentially paying itself b/c it houses that tenant at a property the agency owns/manages) what documentation does commerce want to prove that customer is a resident in one of our units? (is lease not required in this circumstance too?)
Nothing is specifically required by the guidelines, though it would be sufficient to include a note in the tenant's file that they reside in a property operated by OlyCAP. In this situation, if the information was easily accessible on a shared drive or something similar, you could have the lease on file to verify but it's not necessary, especially if that would slow down the process significantly. I would hope that your internal accounting and other procedures would easily be able to catch this type of fraud, as it would have to be done by one of your employees.
- Are family members and/or landlords who live at the same address as the tenant allowed to receive payments with no further questions or documentation asked? Are family members (same last name) allowed to receive rent assistance with no other due diligence?
Yes. Though, either of these would be a situation that you could name as a "red flag" where you would need to do a little further investigation. This could be as simple as separate conversations with the tenant and landlord to see if the information lines up, verifying that the property exists and matches description in the paperwork (for example, if someone says they live in a one bedroom house and a google search brings up an apartment building), or something else.

Let me know if you have any other questions.

Best,

Mika Semrow (they/them/theirs) | GRANT COORDINATOR
Office of Family and Adult Homelessness | Washington State Department of Commerce
www.commerce.wa.gov | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Subscribe](#)

Cell: 360-791-3409

Email communications with state employees are public records and may be subject to disclosure, pursuant to Ch. 42.56 RCW.

From: Cherish Cronmiller <ccronmiller@olycap.org>
Sent: Thursday, February 17, 2022 4:13 PM
To: Kathy Morgan <KMorgan@olycap.org>; Semrow, Mika (COM) <mika.semrow@commerce.wa.gov>
Subject: RE: ERAP follow up questions

External Email

Mika- thanks for answering some of the questions I have made inquiry about. As an attorney, I am a bit annoying with respect to having matters in writing, so I appreciate your guidance with the staff, but it would ease my fears to have answers via email.

- When rent is paid to benefit a customer of the agency (so agency is essentially paying itself b/c it houses that tenant at a property the agency owns/manages) what documentation does commerce want to prove that customer is a resident in one of our units? (is lease not required in this circumstance too?)

- Are family members and/or landlords who live at the same address as the tenant allowed to receive payments with no further questions or documentation asked?
- Are family members (same last name) allowed to receive rent assistance with no other due diligence?

Already addressed:

- Does commerce feel that staff should run a parcel search on the county database in order to confirm the actual owner of the property (versus who is listed as landlord)

Commerce: -No, a parcel search isn't necessary, because the landlord does not have to be the property owner. However, it is encouraged in cases where staff have reason to suspect the tenant or landlord is giving false information.

- Is it allowable for the vendor (person paid) to not match the owner of record with the county? (And to not have any further documentation, such as a lease?)

Commerce: -Yes, it is okay, and encouraged. We know that many people, especially BIPOC, "double up" when facing housing insecurity to avoid unsheltered homelessness—that is, they couch surf, stay with friends and family, etc. We explicitly have defined the landlord for the purposes of this program as "person to whom a rental obligation is owed." This can be a family member/friend, someone subletting their apartment, a landlord, etc. as part of a push to ensure funds are being disbursed equitably.

- Is it ok that a customer receiving the benefit has not provided any documentation tying them to the actual address where they are receiving assistance? (ID doesn't match, no lease, no bills in that person's name, etc?)

Commerce: Again, this could be something you could ask for if you suspect fraud (aside from IDs, which we know people often have trouble obtaining and which you are prohibited from collecting by the guidelines), but no, it is not necessary. It is our intention that this program be easy to access, and these sorts of requirements can not only make it so that people very much in need can't access help, but as you mentioned, it also slows down the process. It is our hope that the increased flexibility of this program means that you do not see the six month application process, as we did in some places with T-RAP. As you probably heard, that was a big critique of that program last year, and one some counties continue to struggle with given staggeringly high need.

Staff is working VERY HARD at getting money out the door and serving the community. I want to be sure that they are doing their due diligence with respect to any potential fraud. I want to be sure that these files pass scrutiny not just now, but if this is monitored in a year or two?

I appreciate your help and the guidance. Please know these questions are coming from me, the staff feels very comfortable with what they have been told and directed, but I am the one seeking clarification in writing to offset potential concerns. Thanks.

- -
 Cherish L. Cronmiller, Esq.
 Executive Director, OlyCAP
(Olympic Community Action Programs)
Serving Clallam and Jefferson Counties, WA
cherish@olycap.org
 Office: 360.385.2571 x.6308
www.olycap.org

*she/her/hers

From: Kathy Morgan <KMorgan@olycap.org>

Sent: Thursday, February 17, 2022 3:59 PM

To: Semrow, Mika (COM) <mika.semrow@commerce.wa.gov>; Cherish Cronmiller <ccronmiller@olycap.org>

Subject: ERAP follow up questions

Hello Mika!,

I have cc'd Cherish on this email. She has direct questions she needs clarification on besides the ones I already sent you.

Thank you,

Kathy

Kathy Morgan,

Pronouns: She/her

Director of Housing and Community Development

Olympic Community Action Programs

823 Commerce Loop Rd.

Port Townsend, WA. 98368

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kmorgan@olycap.org