

Coordinating Low-income Housing Planning (CLIHP) Grant Instructions 2023-2025

**GROWTH MANAGEMENT
SERVICES**

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Grant Overview

The Department of Commerce (Commerce) has identified that Washington state will need 1.1 million more housing units by 2044 to meet our future housing needs, and half of that need is for the lowest income housing segments, or those earning below 50% of area median income (AMI). In addition, there is a projected need of 91,000 emergency housing beds by 2044.¹

Over the next few years, local governments will update their comprehensive plans under the Growth Management Act (GMA). For the first time, local governments will need to plan for housing for all income levels, and for permanent supportive housing and emergency housing.²

Based on this significant housing need and this new planning framework, it is important that land use planners engage with emergency housing professionals to plan for and accommodate housing affordable to all incomes. Similarly, affordable housing and emergency housing professionals will be contributing to updates of Housing and Urban Development (HUD) Consolidated Plans and/or their county's 5-year homelessness plans by 2025, and coordination with land use planning will be beneficial.

To meet these housing needs, significant planning and coordination across sectors and disciplines is needed. This new Coordinating Low-income Housing Planning (CLIHP) grant will support coordinated regional planning efforts through grants to local governments as they embark on this work.

Grant Objectives

- Support coordination of land use planning and homeless service planning to better plan for our state's housing needs as both disciplines update their planning documents.
- Support counties and cities to work together to coordinate resources and plan for their lowest income housing needs through their upcoming comprehensive plans, consolidated plans, homelessness plans, and other efforts.
- Incentivize jurisdictions to develop policies and regulations that allow and encourage housing that supports our lowest income households and reduces unsheltered homelessness.

Eligible Grant Activities

The following activities are eligible for funding up to \$25,000. A minimum of one of the following required activities must be completed.

- For counties that have a HUD Consolidated Plan (5 counties) – coordinate HUD Consolidated Plans and 5-year homelessness plans with Growth Management Act (GMA) comprehensive plans so they have consistent policies and data as they all are updated over the next few years.
- For Balance of State jurisdictions³ – coordinate planning of 5-year homelessness plans with GMA comprehensive plans so they have consistent policies and data.

¹ By comparison, we have approximately 3 million homes in Washington today and about 15,150 emergency housing beds in the Washington Housing Inventory Count as of early 2023.

² See Definitions at the end of this document for explanation of terms.

³ See <https://deptofcommerce.box.com/s/sxe8ml6qkrj1p1c4qkkbcq86ow8wxr9s> for "balance of state" jurisdictions.

- Develop countywide planning policies that support planning for the lowest income housing needs and allocations of countywide housing needs to individual jurisdictions, including allocation of emergency housing and permanent supportive housing (PSH) needs.
- Coordinate conversations and resource sharing between counties and cities on affordable housing and homelessness planning.
- Other activities related to implementing grant objectives, as approved by Commerce.

In addition to the above eligible activities, jurisdictions may apply for up to \$25,000 in additional funds for more of the above activities and/or one or more of the following optional activities so long as the work benefits all eligible jurisdictions on the application:

- Updating development regulations to allow emergency housing and shelters, PSH and transitional housing in more areas, consistent with [RCW 35A.21.430](#), [RCW 35.21.683](#), and [RCW 36.70A.070\(2\)\(c\)](#).
- Community planning and implementation of land use incentives and regulatory changes to encourage development of more affordable housing types, particularly those for households below 50% of area median income (e.g., adoption of regulations to reduce parking requirements, create proportional impact fees or system development charges that encourage smaller more affordable units, allow single-room occupancy housing, etc. or to allow bonus densities for affordable housing development).

Grant Funding Criteria and Amounts

Grant Eligibility

Grants are available to a **county or a city** planning department, or a **county or city** homeless housing lead or similar designated official or department (i.e., local government).⁴ **A non-profit organization may lead the work, but it must be sponsored by a city or a county which would contract with Commerce.**

Grants applicants **must** partner with others in one of the following ways:

- Counties in coordination with one of the two biggest cities,
- A city in coordination with the county, or
- A county or city in coordination with one or more non-profit providers of affordable housing and/or homeless housing or services.

Commerce will award no more than one grant per county, so applicants are encouraged to work together.

Grants are available to both fully planning GMA counties/cities and partially planning GMA counties/cities.⁵

Note that in addition to the above grant application partnerships, a letter of commitment from an elected official is required for the grant application to be deemed complete. See "Letter of Commitment" section below.

⁴ Local non-profit housing or homelessness providers that are not part of a county or city local government are not eligible to be the direct recipient of grant funds, but may partner with a county or city on the grant application and may be a sub-recipient of grant funds from the county or city.

⁵ For a map of fully planning and partially planning counties/cities, see the map on [Commerce's Periodic Update webpage](#). Those counties with stars are partially planning; the remainder are fully planning.

Grant Amounts

One million dollars of funding is available through this grant program, split equally between the two-year biennium. This grant is funded with State General Funds.

Up to \$25,000 in funding is available for one or more of the required eligible activities, and up to \$25,000 of additional funding is available to complete more of the required or optional activities.

Based on the funds available in each state fiscal year, no more than \$25,000 will be awarded to any applicant per state fiscal year.⁶ Funds awarded for each fiscal year must be spent within the fiscal year allotted.

Through the scope of work (SOW) and budget, applicants should indicate what eligible grant activities they propose to do, how much funds are needed for each activity, and a proposed schedule for performing the work and submitting deliverables. Commerce will work with awarded applicants to determine how much funding can be awarded in each fiscal year based on the number of applications and the required fiscal split of the overall grant funds. Given that there is less time to do work in state fiscal year (SFY) 2024, grantees may be more likely to get more funding if they can complete work in SFY 2024.

Grant Deliverables

This grant is a deliverable-based grant, therefore funds will be reimbursed based on receiving the deliverables identified in the scope of work.

Grant Prioritization

Commerce will prioritize grant applications (one per county or planning region) based on the following criteria and guidelines:

- The counties with the highest overall percentage of people whose income is below poverty level (see [this Excel file](#)).
- The counties with the highest overall percentage of future housing needs below 80% of Area Median Income (AMI) as determined by the Department of Commerce in their Housing for All Planning Tool (HAPT) using medium population projections provided by the Office of Financial Management (see [this Excel file](#)).
- Complete proposals and "Additional Evaluation Criteria" included in the application (see the next page for these instructions).
- Funding as many complete county/city applicants as possible.

Grantees with the highest ranking of the first three criteria above will be awarded up to \$25,000 in funds until one completed application from each county (or planning region) is funded or the \$500,000 allocated for grants in each fiscal year is reached. After all eligible grantees receive the base \$25,000 award, and if additional fiscal year grant funds remain, applicants will be eligible for up to \$25,000 in additional funds based on the same ranking criteria.

⁶ State fiscal years run July 1st through June 30th, so State Fiscal Year 2024 (SFY 2024) runs July 1, 2023 through June 30, 2024 and SFY 2025 runs July 1, 2024 through June 30, 2025.

Additional Evaluation Criteria

All grant applications will be reviewed against the following evaluation criteria.

- **Readiness to Proceed: (To be included in cover letter or at the end of the Scope of Work table)**

How ready are the applicants to complete this project in a timely manner? Please describe your plan to initiate and complete the project by June 15, 2025.

If known, identify the key staff or consultants who will be implementing the project along with their history regarding their ability to successfully complete grant projects. Please indicate if you plan to hire a consultant but have not started the process.

- **Local Commitment to the Project: (To be included in cover letter or attachment to cover letter):**

Indicate the level and type of support that the appropriate legislative body(s) will provide to the project. For example, include the amount of staff time, resources, and/or funding that is committed to the project, as well as other funding and “in-kind” support.

- **Scope of Work: (To be addressed at the end of the Scope of Work and Project Schedule table)**

Explain why you selected the actions and deliverables in your scope of work. Grant award amounts will consider the level of effort involved in the scope of work. (e.g., Jurisdictions who propose one meeting or minimal work to complete grant deliverables may receive lower award amounts than a jurisdiction with a wider scope of work that seeks funding to hold multiple coordination meetings or complete more extensive work to develop policies and gather information.)

- **Proposed Budget:**

As presented in the Proposed Budget/Financial Information table (no narrative required).

Interaction with other Grants

If you have applied, or intend to apply, for other grants from Commerce, such as periodic update grants (PUG), the agency cannot pay for the same work item more than once. *If similar or overlapping activities are in more than one grant, the work items must be carefully defined so they do not duplicate work paid for by another Commerce grant or another source of state funding.*

Grant Timeline

- January 11, 2024: Grant applications available on the Growth Management grants website: <https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-grants/>
- January 23, 2024, from 3 to 4 pm: Pre-application Zoom conference about the grant. [Use this link](#) to register for the pre-application Zoom conference and an email will be sent to you will access information.
- **February 16, 2024 at 5:00 pm: Grant application due to Commerce for first review.** Submit completed applications to gmsgroups@commerce.wa.gov.
 - **Applications will continue to be received through March 29, 2024, but applications received by February 16th will receive first priority for funds.**

- February 27, 2024: First awards announced. Award letters indicate that work may proceed as the contract is developed and executed.
- June 30, 2024: Deadline for spending contracted funds for first portion of grant (fiscal year 2024 funds). Unspent fiscal year 2024 funds do not rollover.
- June 15, 2025: Final grant deliverables and invoices for second portion of grant (fiscal year 2025 funds) must be submitted to Commerce.

Completing the Grant Application Form

Summary Page

Provide the name of your agency and your partners for this application (see "Grant Eligibility" above), contact information for the point person for this application, and total grant funding requested (max award: \$50,000). Indicate which eligible activities you are requesting funding for.

Jurisdiction Information

Complete the requested fields with all applicants' information. Submit a separate "applicant information page" for each applicant partner (county, city, non-profit). Indicate which entity is the lead for purposes of administering the grant.

Unified Business Identifier (UBI) Number: For entities in Washington state, the 9-digit Unified Business Identifier (UBI) is assigned for doing business in Washington state. It is written as “___-___-___.” Your accounting/finance officer should provide this number or you can search for it here: [Washington State Department of Revenue](#).

Statewide Vendor (SWV) Number: This is a nine digit number assigned by the state to your jurisdiction or organization in order for direct deposit/EFT payments. It is typically written as “SWV xxxxxxx- xx.” Your accounting/finance officer should provide this number. Contact us for more information.

Authorized Official: Please provide the name and title of the official authorized to sign the grant agreement on behalf of the lead jurisdiction. Usually this is the Chair of the County Commission or County Council (for a county) or the Mayor or City Manager (for a city). However, it may be a designated administrative officer, such as the department director, depending on your jurisdiction’s policies and governance structure. Please provide the name and title as it should appear under the grant agreement signature line.

Additional Grant Information

Homeless Coalition Partner: Please identify the homeless coalition partner to be involved in your planning grant work and their contact information. This may be a local county human services or housing agency, Continuum of Care (CoC) provider, or other lead non-profit coordinating homeless services and planning in the county/city. Indicate when and how you notified them that you would be applying for this grant. It is encouraged (but not required) that a letter or email from the organization be provided showing their support of this grant work.

Direct Funding or Technical Assistance: Commerce has the opportunity to provide grant support directly through funding or by contracting with a consultant who would be reimbursed directly from Commerce to provide support for eligible activities. Please indicate your preference for receiving direct support. Note that the

ability of Commerce to provide direct technical assistance via a consultant would depend on the number of interested jurisdictions, timeline for contracting, and availability of consultants.

Scope of Work and Project Schedule

The application shall include a scope of work (SOW) with clear deliverables and a project schedule. This is a performance-based contract, therefore counties or cities will be paid upon satisfactory completion of deliverables rather than hours spent working on the project. Please note this is different than how some consultants currently contract with cities or counties.

The SOW should be itemized into grant objectives, steps and deliverables as explained below. Unless otherwise noted, each of the parts below should have a start and end date. If only a month and year are given, we will assume that the estimated start date is the first day of the first month and the estimated end date is the last day of the last month.

- **“Grant Objectives”** refer to the components of the project (i.e., eligible activities). They are provided as an organizing element within the scope of work, as shown below.
- **“Steps”** are the work activities that this particular portion of the project entails. Steps need an estimated end date. Start dates are optional.
- **“Deliverables”** are the final products that the grant and/or portion of the grant will generate. The applicant will need to deliver these products by the dates indicated in the “End Date” column. Start dates are not needed for deliverables, as the start date is the start of the first step leading to the deliverable.

An example scope of work is included below, **please note the example is for illustrative purposes only.**

When developing your SOW, please be aware that:

- The SOW in the grant application will be used to develop a contract agreement if the grant is awarded.
- **You are likely to receive more funds if half of the deliverables are completed by June 30, 2024, and the other half are completed between July 1, 2024 and June 15, 2025.**
- Applicants are not limited to the number of lines represented on the grant application form. Add additional lines as needed.
- If a grant objective is currently in progress at the time you are applying for this funding, clearly document progress to date and detail the tasks that will be carried out using grant funds. Grant funds may be used for any tasks occurring after July 1, 2023.
- The final due date for any deliverable must be no later than June 15, 2025.

Example Scope of Work

NOTE: The Example Scope of Work below is provided as a guide and should be tailored to each individual jurisdiction's plans.

Grant Objective: Coordinating HUD consolidated plan and 5-year homelessness plan with Growth Management Act (GMA) comprehensive plan so they have consistent policies and data			
Action/Steps/Deliverables	Description	Start Date	End Date
Step 1.1	Identify overlapping pieces of comprehensive plan, consolidated plan, and 5-year homelessness plans to coordinate and align.	March 2024	May 2024

Step 1.2	Identify parties to connect with on the grant work (groups or organizations to provide data or who participate in the system), their contact information and their role in the work. Refine timeline for activities, coordinate meeting dates and objectives, identify sources of information, and contract with contractors as needed.	March 2024	April 2024
Deliverable 1	Project plan for grant funds		May 15, 2024
Step 2.1	Coordination meetings	April 2023	June 2024
Deliverable 2	Meeting agendas, attendee lists, and notes from coordination meetings to date, as well as schedule for future meetings		June 15, 2025
Step 3.1	Develop coordinated strategic policies for comprehensive plan, consolidated plan and 5-year homelessness plan	July 2024	November 2024
Step 3.2	Identify baseline existing conditions data to include in plans	July 2024	November 2024
Step 3.3	Identify future priorities to include in plans	November 2024	March 2025
Deliverable 3	Draft coordinated data and policy pieces for comprehensive plans, consolidated plan, and 5-year homelessness plan		March 15, 2025

Grant Objective: Develop coordinated countywide planning policies and allocations of projected housing needs for comprehensive plans to be used as a foundation for the comprehensive plan, consolidated plan, and 5-year homelessness plan

Step 4.1	Gather land capacity information for each jurisdiction	March 2024	March 2024
Step 4.2	Research allocation methodologies from other jurisdictions	March 2024	March 2024
Step 4.3	Discuss and revise countywide planning policies	March 2024	April 2024
Step 4.4	Discuss and decide on countywide housing needs allocation	April 2024	June 2024
Deliverable 4	Agreement on countywide planning policies and housing needs allocation (formal adoption to follow with annual update, data to be included in consolidated plan and 5-year homelessness plan)		June 15, 2024

Grant Objective: Adopt development regulations to allow supportive housing types in more areas of each jurisdiction to enable the future development of housing to meet the lowest income housing needs

Step 5.1	Research Commerce's guidance on regulating supportive housing types	July 2024	August 2024
Step 5.2	Draft regulations on supportive housing types	September 2024	November 2024
Step 5.3	Public hearing sessions on supportive housing regulations	December 2024	February 2025
Deliverable 5	Adopted regulations to allow supportive housing consistent with RCW 35A.21.430, RCW 35.21.683, and RCW 36.70A.070(2)(c)		April 30, 2025

Scope of Work Narrative: For each grant objective, please explain why you selected the deliverables in your scope of work and your readiness to proceed with this work.

Budget and Financial Information

In the budget table, provide detailed information about the project's cost by assigning a cost to each deliverable in the scope of work. Commerce recommends the budget for each deliverable be based on the level of effort and expenses estimated by all parties participating in the work. If a grant is awarded, budget amounts can be adjusted before the final contract agreement is executed to align with consultant expenses (if applicable) or updated information.

Sample Budget to Match SOW Above

NOTE: The example budget below is provided for general format assistance only.

Deliverables	Deliverable Due Date	Commerce Funds SFY 2024	Commerce Funds SFY 2025
Deliverable 1: Project plan, including outline of materials and policies requiring coordination for comprehensive plan, consolidated plan, and 5-year homelessness plan	May 15, 2024	\$10,000	
Deliverable 2: Meeting agendas, attendee list, and notes from coordination meetings	June 15, 2025		\$ 2,500
Deliverable 3: Draft coordinated data and policy pieces for comprehensive plan, consolidated plan, and 5-year homelessness plan	March 15, 2025		\$12,500
Deliverable 4: Agreement on countywide planning policies and housing needs allocations	June 15, 2024	\$15,000	
Deliverable 5: Adopted regulations to allow supportive housing consistent with RCW 35A.21.430, RCW 35.21.683, and RCW 36.70A.070(2)(c)	April 30, 2025		\$10,000
Total:		\$25,000	\$25,000

Letter of Commitment

Authorizing Official Letter

A letter of commitment from the Chair of the county commission or county council, the mayor, city manager, or other authorized official should accompany the completed application form. The letter should include the following language or similar language as modified to your specific grant proposal:

I, [NAME AND POSITION IN COUNTY OR CITY], authorize the [COUNTY/CITY] to propose the attached scope of work and budget request for grant funding to coordinate local low-income housing planning efforts. We recognize this grant requires coordination between counties and cities and we have engaged and submit this application with [NAME OF COUNTY OR CITY PARTNER]. We have also engaged and notified our emergency housing planning lead, [NAME AND TITLE OF PERSON AT LOCAL HOMELESSNESS ORGANIZATION OR AGENCY], of our intention to work with them on these grant activities.

We propose to use the grant funds to [REQUESTED ELIGIBLE ACTION]. We commit to completing this work by June 15, 2025 and have the available resources and staff to support his work if we are awarded the grant funds.

Our proposed timeline for this work is included in the attached scope of work. [PROVIDE ANY OTHER INFORMATION ON READINESS.]

[IF A FULLY PLANNING COUNTY...] We also understand that the GMA requires us to adopt policies and regulations to plan for and accommodate all housing needs. These policies and regulations, informed by this grant work, will be considered and adopted as part of our scheduled periodic review update to our comprehensive plan deadline.

Application Format and Submittal Requirements

The application form should be submitted in Microsoft Word so that it can easily be turned into a contract agreement if selected. Any additional application materials (letters of commitment, cover letter, etc.) should be 15 pages or less. The letter of commitment should be scanned and attached, or have a scanned signature of the elected or appointed individual within the organization authorized to sign this letter. The letter of commitment may be submitted after the application deadline, but must be received before the grant award. Please include a note in your application email when the letter of commitment will be submitted if not included initially.

For more information, please contact:

Laura Hodgson, Housing Planning and Data Manager, laura.hodgson@commerce.wa.gov

Definitions

- **"5-year homelessness plans"** are state-required data-driven plans that aim to reduce homelessness.
- **"Comprehensive Plans"** are the policy tool that local governments use to plan for the next twenty years of growth, and are defined as "a generalized coordinated land use policy statement of the governing body of a county or city" that is adopted pursuant to RCW Chapter 36. (RCW 36.70A.030(8)).
- **"Consolidated Plans"** are HUD-required plans to help local jurisdictions assess their affordable housing and community development needs and to make data-driven investment decisions.
- **"Emergency housing"** means temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement. (RCW 36.70A.030(14))
- **"Emergency shelters"** means a facility that provides a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy

agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations. (RCW 36.70A.030(15))

- **"Permanent supportive housing"** means subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors. Permanent supportive housing is paired with on-site or off-site voluntary services designed to support a person living with a complex and disabling behavioral health or physical health condition who was experiencing homelessness or was at imminent risk of homelessness prior to moving into housing to retain their housing and be a successful tenant in a housing arrangement, improve the resident's health status, and connect the resident of the housing with community-based health care, treatment, or employment services. Permanent supportive housing is subject to all of the rights and responsibilities defined in chapter [59.18](#) RCW. (RCW 36.70A.030(31))
- **"Supportive housing types"** means emergency housing, emergency shelters, permanent supportive housing and transitional housing.
- **"Transitional housing"** means a project that provides housing and supportive services to homeless persons or families for up to two years and that has as its purpose facilitating the movement of homeless persons and families into independent living. (RCW 84.36.043(3)(c))

Other Helpful Resources

Commerce has a variety of materials available.

Growth Management / Comprehensive Plan Resources

- Resources on the [comprehensive planning process](#), including a video on [comprehensive planning basics](#)
- Information on the [updates required for housing planning](#), including a video on:
 - How much housing each jurisdiction should plan for across all income brackets ([Vimeo starting at 10:33](#))
 - How local jurisdictions can work together to decide where growth should go within a county ([Vimeo starting at 18:29](#))
- Communications [videos and presentations on housing topics \(bottom of page\)](#):
 - Why we need more housing ([video](#), [presentation](#))
 - Housing Washingtonians with a variety of housing types ([video](#), [presentation](#))
 - Planning for the homeless and lowest income bracket ([video](#), [presentation](#))
- [Supportive Housing Types Review Checklist](#) - helps local governments review and prepare development codes that regulate the supportive housing types listed in HB 1220 (laws of 2021).
- Supportive Housing Types [Presentation \(PPT\)](#) and [Recording \(Vimeo starting at 1:07:30\)](#) - provides an overview of the new supporting housing requirements adopted by HB 1220 (2021), more information about these supportive housing types, what local governments have done in response, and considerations and supports for jurisdictions undertaking this work.
- COMING SOON (June 2024): A model ordinance for supportive housing types, best practice guide for local governments as they plan for these housing needs, and communications toolkit.

Consolidated Plan and Homelessness Planning Resources

- Information on what [a Consolidated Plan is](#) (U.S. Housing and Urban Development)
- Commerce's [Consolidated Plan information](#) (see "Consolidated Plan" section)
- Commerce's [State Strategic Plan and Annual Report to the legislature](#) on Washington state's efforts to address homelessness
- Washington counties [5-year homeless plans](#)

Questions and Answers

Answers to potential questions about the CLIHP Grant are below.

- 1. If a city or county previously received funding for comprehensive plan periodic update work or other homeless planning assistance in 2023, does that disqualify them or lower their competitive chances of getting a CLIHP grant during the 2023-2025 the biennium?**

No, so long as the grant funds already used do not cover the same activities proposed under this CLIHP grant.

- 2. Can the non-profit be the lead applicant on the application?**

No. The non-profit may lead the grant work if the local government does not have capacity to do so, but grant funds can only be distributed to the local government. The local government may then reimburse a non-profit for time spent on this grant.

- 3. What if we have trouble identifying deliverables to be split across the biennium (deliverables through June 2024 and deliverables July 2024-June 2025)?**

Commerce recognizes that the requirement to split grant funds between fiscal years may be difficult. Please do your best to split tasks and funds across the biennium in the application and Commerce can work with the applicant (if awarded) to revise the schedule and activities as needed before the contract is signed. Although we will make all efforts to support local needs and timelines, we are unable to waive this requirement, so all desired activities and timelines may not be able to be accommodated.

- 4. How do we identify our local homeless coalition partner in our county?**

If your county does not have a local government agency or contact that writes their HUD Consolidated Plan or develops the [countywide 5-year homelessness plan](#), we encourage you to contact your local Community Action Council or Commerce's Homelessness Assistance Unit Managing Director Kathy Kinard (Kathy.Kinard@commerce.wa.gov).

- 5. Can grant funds be used to incorporate feedback from those with lived experience?**

Grant funding may be used to support the integration of lived experience perspectives into these policy conversations and data collection and/or verification, so long as the overall eligible grant activities and deliverables are completed.

6. What can grant funding be spent on?

Generally, grant funds are eligible to be spent on consultants (including non-profits) and/or local government staff time. All subcontracting must follow the provisions of Commerce's standards inter-agency contract (available upon request). Funds may also be used to reimburse participants for time spent at meetings and materials to support meetings, provided the grantee follows all state and federal laws including retaining records for the minimum time required under state law.

7. What documentation of expenses or records are needed when invoicing for deliverables?

When deliverables are complete and invoices are submitted to Commerce, we require a completed Commerce A-19 invoice form and subcontractor data. The Commerce A-19 form requires county or city contact information, authorized official signature, contract number, period work was performed, and indication of what deliverables were completed (timesheets not needed). The subcontractor data will include a report, in a form and format to be provided by Commerce and at intervals as agreed by the parties, regarding work under this Contract performed by subcontractors and the portion of Contract funds expended for work performed by subcontractors, including but not necessarily limited to minority-owned, woman-owned, and veteran-owned business subcontractors. "Subcontractors" shall mean subcontractors of any tier. Subcontractor invoices are not needed.

8. Can the grant be used to pursue strategies and programs that might remove barriers to extremely and very low-income housing?

Yes, but these need to be defined in the form of contracted deliverables and can only be contracted for if one of the other required eligible activities is also completed. The use of funds for these activities must clearly benefit both county and city governments (i.e., both entities would need to develop policies or regulations as a result of this work) and other Commerce funding could not be used for this specific activity.

If these minimum guidelines were met, grant funds could be used to support policy and/or code amendments improving permit efficiencies, changes to fees, and implementing other programs that will facilitate bringing low-income housing to the market sooner or at less cost than might otherwise be the case. A jurisdiction might, for instance, consider reviewing and, where appropriate, amending:

- Impact fee and other fee structures
- Affordable housing incentives
- Permit procedures, including creating or revising permit applications and informational materials for supportive housing types
- Infrastructure investment strategies