

SUBJECT: Community Behavioral Health Rental Assistance (CBRA)	REFERENCE #SH 7.12
DEPARTMENT: Care Management	PAGE: 1 of 1
TYPE: <input type="checkbox"/> SOP <input type="checkbox"/> Task List <input type="checkbox"/> Policy <input checked="" type="checkbox"/> Information	REVISED: 6/1/22/,12/16/25

**PURPOSE:**

The information in this chapter is provided to give an overview of the various housing programs currently at MDC.

**INFORMATION:**

- Supportive Housing staff also serve individuals who may or may not be housed in one of MDC’s units. This includes participants from the Community Behavioral Health Rental Assistance Program.
- These participants qualify for Medicaid supportive housing services and rental assistance to maintain housing stability.
- Referrals are made both internally and externally from the organization and program is not time limited
- Each participant is assigned to a Care Coordinator at MDC or community provider. The Care Coordinator assists the participant in finding, securing, and maintaining housing in the community.
- Care Coordinators working with participants abide by the supportive housing model outlined in section 6.4 of this manual, and Guidelines provided by Washington State Department of Commerce following specific eligibility requirements workflow/documentation requirements outlined in manual.
- Rents may vary but should be maintained around 30% of the participants’ income for increased housing stability.
- MDC will check in with each participant or landlord receiving CBRA quarterly to ensure residents are still housed in the unit. All check-ins must be documented and include landlords name, tenants name, date of each attempted contact, date contact was made, and the signature of the program staff or landlord verifying housing.
- This program, although not time limited, does have an income limit and will be followed; goal is to move participants to stable form of subsidy.
- Performance Measures help evaluate the effectiveness of the Permanent Housing Subsidy programs. For more details, see the Department of Commerce CBRA Guidelines.
- Commerce has identified the following as the most critical performance measures for Permanent Housing Subsidy programs:
  - o Increasing retention in the PHS program or exits to permanent housing.
  - o Ensuring equitable outcomes for vulnerable populations.
- Habitability Policy, Grievance located in Appendix A 32 manual.

SUBJECT: Screening and Eligibility	REFERENCE #SH 5.2
DEPARTMENT: Care Management-CBRA	PAGE: 5 of 8
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## COMMUNITY BEHAVIORAL HEALTH RENTAL ASSISTANCE

The MDC Community Behavioral Health Rental Assistance (CBRA) Program provides long-term or bridge rental subsidies to high-risk individuals with behavioral health conditions and their households whose income is at or below 50% of Area Median Income (AMI). MDC partners with Washington State's Foundational Community Supports (FCS) program to offer voluntary, person-centered supportive housing services, enabling individuals with complex behavioral health needs to live independently in community-integrated housing.

### **Eligibility requirements:** (see CBRA guidelines)

A household is one or more individuals seeking to obtain or maintain housing together. A household does not include friends or family that are providing temporary housing.

Households eligible for rental assistance under this program must have an adult member of the family who meets **ALL** the following criteria:

1. Household income at or below 50% of Area Median Income (AMI). AMI limits can be located at [www.huduser.gov](http://www.huduser.gov). Income is defined as money that is paid to, or on behalf of, any household member. MDC will determine income eligibility based on the current gross annualized income of all household members aged 18 and older and all unearned income attributable to minors.
2. Income eligibility determinations are made at the time of program enrollment, and verification must follow all applicable federal and state guidelines to include the following federal inclusions and exclusions:
  - **TANF** or other forms of public cash assistance (ABD, HEN, etc.).
  - Basic food benefits
  - Payments made to someone outside of the household for the benefit of the household
  - Third Party payments as income when a payment is specifically directed to be paid to a third party and does not pass through the household's control at any time and isn't otherwise payable to them.
3. Income will be verified at recertification and the CBRA income eligibility worksheet, and all allowable income documentation will be placed in the client file.
4. Documented Behavioral Health Condition impairing activities of daily living and expected to be of long duration. Acceptable documentation for verification are:
  - Written verification from a medical or behavioral health professional or social worker.
  - Written verification from SSA, DSHS, VA, or other state/federal agencies.
  - Written verification from HARPS, the Foundational Community Supports Program, or other long-term supportive services programs that have previously determined the presence of a behavioral health disability for program or service eligibility.
  - Written self-attestation from the individual or statement from immediate family members.
    - This method is to be used only if no other documentation method is available. Case manager must indicate why no other documentation is available.
  - Other Documentation as approved by commerce.
5. Eligible for long-term support services programs. Individuals excluded solely due to citizenship status meet this requirement.
6. Documented need for long-term housing subsidy with no other suitable resource.
7. Services and housing must support participant choice and avoid undue hardship.

Individuals that would otherwise be eligible for an approved long-term supports program but are not due to citizenship status meet Criteria Three.

Voluntary, Supportive Services partner with CBRA subsidies to help individuals with behavioral health conditions live with maximum independence in community-integrated housing. Supportive services programs should make available:

### **A. Pre-Tenancy Supports**

- Assistance identifying housing needs and preferences.
- Help with housing searches and applications.
- Support understanding leases and tenant rights.
- Coordination with landlords during the application process.

### **B. Tenancy-Sustaining Services**

- Coaching and support to maintain lease compliance.
- Assistance with landlord communications.
- Resource navigation and community support.
- Crisis planning and conflict resolution.
- Coordination with behavioral health providers.

Note: MDC will not terminate or deny services to households based on a household's refusal to participate in supportive services.

### **Prioritization Requirements:**

MDC will prioritize households meeting eligibility criteria for the program that are discharging or needing to discharge or who have discharged from state psychiatric hospitals or community psychiatric inpatient beds within the past 12 months.

Households that meet eligibility criteria for the program that are not within the priority population may be served. MDC will make a reasonable effort to ensure that individuals in the priority population have first access to available funds.

Upon approval from Commerce, CBRA grantees may get additional local prioritization criteria, based on community need, if the priority population above has been exhausted. Grantees using local prioritization criteria must produce and maintain a prioritization policy that includes a detailed explanation of all priority populations, criteria used to determine an individual is part of priority, and how they will be prioritized.

A waitlist will be maintained, and applicants will be reached out to according to availability.

SUBJECT: Resident Grievance	REFERENCE #SH 17.1
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**PURPOSE:**

All MDC residents have the right to a fair and impartial hearing regarding their rights and agency decisions affecting their welfare or status as an individual receiving services. The grievance procedure and process is an important concern of MDC to provide quality care and ensure individual satisfaction.

**DEFINITION:**

Grievance is defined as a contention of misapplication, violation, or inequitable application of the policies and procedures of MDC.

**PROCEDURE:**

- All residents should receive a copy of grievance procedures as part of their move-in paperwork. Translated in preferred language and with accessibility accommodation upon request or as indicated.
- If a resident would like to file a grievance, they shall state his/her concerns in writing addressed to their assigned Care Coordinator or other designated supportive housing staff member. (Assistance provided upon request)
- Residents have the right to file a grievance with staff not involved in the grievance.
- The Care Coordinator or designee will review the complaint, and contact the parties involved.
- If the complaint is minor in nature and can be resolved by discussion, no further action will be required.
- If the complaint is directed toward the Care Coordinator, the complaint may be addressed to the Manager.
- If the complaint is not resolved, a formal discussion of the residents' concerns will be scheduled with the resident, the Care Coordinator, all parties involved in the complaint and the Director.
- After all points of view are expressed, the Director will render a decision within 5 working days of the meeting, based on the information provided.
- A copy will be provided to the Resident, the Care Coordinator, and all other parties involved in the complaint. A copy will be placed in the resident's file.
- The decision of the Director shall be considered final.
- Funder will respond to complaints that are unresolved by MDC according to their written complaint procedures (for more details, related to Carleon refer to the Complaint Procedure of Carleon 2025 full policy document in appendix)

- If a resident feels that the grievance process did not rectify the situation, the grievance can be escalated further, including the funder without fear of retaliation and anonymous should they choose at the following address:

complaints should be escalated to Carelon in one of the following ways:

- By contacting the General Customer Service Line at
  - <https://www.carelonbehavioralhealth.com/contact-us>
  - 888-204-5581
- Or by contacting the Housing Program Manager at
  - [Evelynn.breitenbauch@carelon.com](mailto:Evelynn.breitenbauch@carelon.com)
  - 360-798-2356
- Carelon will address all unresolved complaints about CBRA services or supports. If the complaint is not resolved to the satisfaction of the complainant at this level, Carelon will assist, where appropriate and necessary, in escalating the complaint to Commerce.
- The **service recipient** escalates the complaint to Commerce in one of the following ways:
  - Completes the online complaint submission form <https://forms.office.com/g/qi63JqFCbr>
  - Emails the CBRA Program Manager at [CBRAADMIN@commerce.wa.gov](mailto:CBRAADMIN@commerce.wa.gov)
  - Emails the HD Quality Assurance Manager at [HDComplaints@commerce.wa.gov](mailto:HDComplaints@commerce.wa.gov).
- Commerce is responsible for addressing all complaints about CBRA services or supports that are unresolved by Carelon.
- If Carelon or Commerce receives a complaint involving MDC that has not been addressed, the complaint will be forwarded through the appropriate channels for MDC to handle initially at the lowest level.
- MDC will maintain a CBRA compliant log which may be reviewed during monitoring or upon request by Carelon.

SUBJECT: Applicant Grievance/Termination	REFERENCE #SH 17.2
DEPARTMENT: Care Management	PAGE: 1 of 2
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**PURPOSE:**

All individual seeking services have the right to a fair and impartial hearing regarding their rights and agency decisions affecting their welfare or status as an individual requesting services. The grievance procedure and process is an important concern of MDC to provide quality care and ensure individual satisfaction.

**DEFINITION:**

A grievance is defined as a contention of misapplication, violation, or inequitable application of the policies and procedures of MDC.

**PROCEDURE:**

- All applicants will be offered and provided upon request and at entry into the program, a copy of grievance procedures, and right to review decision and present concerns as part of their denial of subsidy paperwork.
- If an applicant would like to file a grievance, they shall state his/her concerns in writing addressed to designated supportive housing program within 10 days of receiving decision.
- All applicants have the right to file a grievance with staff not involved in the grievance.
- The Program designee will review the complaint, and contact the parties involved to set up a meeting within 48 hours. Excluding weekends and holidays.
- If the complaint is minor in nature and can be resolved by discussion, no further action will be required.
- If the complaint requires the presentation of additional documentation etc. for reconsideration, the complaint may be advanced to the Manager to be addressed.
- If the complaint is not resolved, a formal discussion of the applicant’s concerns will be scheduled with the applicant, and all parties involved in the complaint with the Director.
- After all points of view are expressed, the Director will render a decision within 5 working days of the meeting, based on the information provided.
- A copy will be provided to the applicant, the Supervisor, and all other parties involved in the complaint. A copy will be placed in the file.
- The decision of the Director with consultation from the CEO when needed shall be considered final.
- Correspondence should be sent to: MDC 721 Fawcett AVE. Tacoma WA. 98402 or drop box at 721 Fawcett AVE. Tacoma WA. 98402
- Funder will respond to complaints that are unresolved by MDC according to their written complaint procedures (for more details, related to Carleon refer to the Complaint Procedure of Carleon 2025 full policy document in appendix) including the funder without fear of retaliation and anonymous should they choose at the following address:

complaints should be escalated to Carelon in one of the following ways:

- By contacting the General Customer Service Line at
  - <https://www.carelonbehavioralhealth.com/contact-us>
  - 888-204-5581
- Or by contacting the Housing Program Manager at
  - [Evelynn.breitenbauch@carelon.com](mailto:Evelynn.breitenbauch@carelon.com)
  - 360-798-2356
- Carelon will address all unresolved complaints about CBRA services or supports. If the complaint is not resolved to the satisfaction of the complainant at this level, Carelon will assist, where appropriate and necessary, in escalating the complaint to Commerce.
- Although MDC prohibits any form of retaliation, applicants have the right to file a complaint directly and anonymously to the WA State Department of Commerce Housing Division if they are afraid of repercussions or retaliation.
- The **service recipient** escalates the complaint to Commerce in one of the following ways:
  - Completes the online complaint submission form <https://forms.office.com/g/qi63JqFCbr>
  - Emails the CBRA Program Manager at [CBRAADMIN@commerce.wa.gov](mailto:CBRAADMIN@commerce.wa.gov)
  - Emails the HD Quality Assurance Manager at [HDComplaints@commerce.wa.gov](mailto:HDComplaints@commerce.wa.gov).
- Commerce is responsible for addressing all complaints about CBRA services or supports that are unresolved by Carelon.
- If Carelon or Commerce receives a complaint involving MDC that has not been addressed, the complaint will be forwarded to the Director of Housing, Tonia Hess at [thess@mdc-hope.org](mailto:thess@mdc-hope.org) . 253-318-1861 through the appropriate channels for MDC.
- MDC will maintain a CBRA compliant log which may be reviewed during monitoring or upon request by Carelon.
- This Grievance process is not meant to replace landlord-tenant law or other applicable laws.

SUBJECT: Safety and Habitability Complaint Procedure	REFERENCE #SH 19.5
DEPARTMENT: Care Management	PAGE: 1 of 2
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## Purpose

In order to ensure that all participants have the ability to pursue resolution of any safety and habitability complaint they may have, the following policy outlines the process in which safety and habitability complaint/s are to be handled. Landlord and Participant will be provided with Habitability standards and expectation prior to move-in and pre-existing tenant after program enrollment.

## Policy Statement

A compliant is defined as a contention of misapplication, violation, or inequitable application of the of lease and landlord tenant laws. All participants have the right to file a complaint without repercussion or fear of losing their Subsidy. The process outlined below is designed to resolve complaints and ensure that all points of view are considered during that process. Please note that the compliant procedure runs concurrently with any legal notices that may be in place.

## Practices/Procedures

If a resident wishes to file a Habitability complaint, they can do so in writing or orally to their assigned Care Coordinator/Case Manager or Any MDC staff if calling. Filing complaints will not affect program eligibility written/verbal complaint will state the nature of the compliant. The completed statement is given to the Care Coordinator/Case Manager stating the Safety and Habitability issue/s.

The Care Coordinator/Case Manager reviews the compliant schedule a mandatory inspection 24 to 48 hours, documents findings on HQS or HHS and contacts the parties involved to try to solve the compliant. If the complaint can be resolved by this discussion, no further action is required other than the documentation of the resolution.

If the complaint is not resolved, a formal discussion of the Participant's concerns will be scheduled with the Participant, and the Manager of Property Management, and MDC Program Manager. All parties will express their points of concern and recommendations for a solution in accordance with RCW 59.18. After this discussion, the Program manager will render a decision within two working days of the meeting in writing. A copy of the decision will be provided to all involved, as well as the Risk Manager and /or CEO at MDC. A copy will also be placed in the participant's file and sent to Property Manager of said site with agreed upon actions that will be taken to ensure habitability is restored to include time frame.

1. If landlord fails to remedy defective condition after receipt of written notice and expiration of the applicable time period provided in RCW 59.18. 070.Tenant's choice of action will be implemented.
2. Terminate the rental agreement and quit the premises
3. Bring an action in an appropriate court
4. Pursue other remedies available under this chapter such as but not limited to withhold rent for repairs, send three reasonable bids to landlord for repairs and deduction of cost from rent.

If the resident is not satisfied with the outcome, they may escalate the issue to the Program Director who will then render a decision within 2 business days. A copy of the decision will likewise be provided to all involved, and a copy will be placed in the participant's file. The Director's decision will be final to ensure a safe and habitable living situation.

If the need to retain legal counsel at any point, all correspondence from the participant will be given directly to retained counsel as a point of contact.

5. Funder will respond to complaints about habitability that are unresolved by MDC according to their written complaint procedures (for more details, refer to the Complaint Procedure of Carleon 2025 full policy document in appendix)

SUBJECT: Safety and Habitability Complaint Procedure	REFERENCE #SH 19.5
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Please note: Residents and applicants of the Section 8 program have the right, under federal rules and regulations, to request an informal hearing if they believe the Housing Authority has acted unfairly toward them with regard to their access to participation in the Section 8 program.

**1. Who should Read this Policy**

Care Management Staff, Resident, Landlord

**2. Definitions**

N/A

**3. Additional information and Resources**

MDC HQS inspection forms available in housing shared drive

HHS available on commerce site

**4. Please provide each participant and landlord a copy upon move-in, program enrollment if already housed and when requested**

**All residents will be provide this policy regardless of housing program to ensure safe quality housing (not just section 8 participants)**

**5. Please note receipt in file**

SUBJECT: CBRA Grievance Policy Accessibility	REFERENCE #SH 17
DEPARTMENT: Care Management	PAGE: 1 of 1
TYPE: <input checked="" type="checkbox"/> SOP <input type="checkbox"/> Task List <input checked="" type="checkbox"/> Policy <input type="checkbox"/> Information	REVISED:

**PURPOSE:**

To ensure the CBRA grievance policy is fully accessible to all individuals- clients, employees, and public stakeholders- through multiple formats and platforms.

**POLICY STATEMENT:**

MDC commits to offering the CBRA grievance policy in accessible formats and through accessible channels to ensure equitable access for individuals with disabilities and to facilitate effective communication and participation in the grievance process.

**METHODS OF ACCESSIBILITY:**

The CBRA grievance policy shall be made available in the following formats:

- Written: Large print and translated versions upon request.
- Digital: Accessible PDFs and HTML formats posted online.
- Alternative Formats: Audio and verbal presentations upon request.

Grievances can be submitted through the following alternative methods:

- Accessible online compliant forms.
- Email submission. **info@mdc-hope.org**
- Phone 253-284-9069 with TTY/Relay support.
- In-person interviews or dictation memoranda.

**NOTICE AND POSTING REQUIRMENTS:**

**On-Site:** CBRA grievance policies are prominently displayed in high-traffic areas within the organization, including:

- Main reception/resources desks.
- Staff -CBRA offices.
- Public area- Welcome Center.

**Online:** CBRA grievance policies are also posted on the following online platforms:

- MDC website: [www.mdc-hope.org](http://www.mdc-hope.org) in housing division (soon to be added once approved by Evie)
- Employee intranet with downloadable formats
- MDC Support Services Team in Policy & Procedure Manual