

# **HEARTH OPERATING POLICIES AND PROCEDURES**

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## I. General Overview

## 1. Background

The Community Shelter Board (CSB) was created in 1986 to respond to the growing problem of homelessness in Franklin County. CSB is a collective impact organization that creates collaborations, innovates solutions, and invests in quality programs to end homelessness in Columbus and Franklin County. The primary objectives of Community Shelter Board are to make sure resources are used in the most effective, efficient way possible, to reduce duplication of services, to assure outcomes are achieved and that the needs of people experiencing homelessness and the community are at the forefront. We are implementing the community's strategic plan to end homelessness, called the Rebuilding Lives Plan. Recognized as a national model for addressing homelessness, CSB allocates over \$31 million annually to support homeless programs and services. Our investments support programs that prevent homelessness, offer basic crisis services in emergency shelters for homeless individuals and families and programs that help households move quickly from homelessness to stable housing.

With our partners, CSB assists over 12,000 men, women and children each year with basic needs and life-saving programs. Using our nationally-recognized model and our strategic Rebuilding Lives plan, we work on the full scope of homelessness priorities: linking people at imminent risk of homelessness to community resources; providing assistance to individuals and families to address their immediate housing crisis; transitioning people from crisis to stability; and advocating for policies and resources to end homelessness.

As a single coordinating body, CSB brings together extensive and diverse organizations in Franklin County to collaborate and work together as a system rather than as a fragmented set of resources. Collaborations include: Rebuilding Lives Funder Collaborative, Adult System Providers, Family System Providers, Supportive Housing Providers, and Citizens Advisory Council. Sixteen nonprofit social service agencies located throughout Columbus and Franklin County are CSB provider agencies.

## 2. Philosophy

CSB funded programs are designed to follow a Housing First approach to ending homelessness. A Housing First approach consists of three components:

- Crisis intervention, emergency services, screening and needs assessment:
   Clients who have become homeless have immediate crisis needs that need to be
   addressed, including the provision of emergency shelter. There should be an early
   screening and assessment of the challenges and resources that will impact a re housing plan.
- Permanent housing services: The provision of housing and services to assist clients in accessing and sustaining housing. Providers work with the client to identify affordable units, access housing subsidies, and negotiate leases. Clients may require support to overcome barriers, such as poor tenant history, credit history and discrimination based on ethnicity, gender, family make-up and income source. Providers need a roster of landlords who are willing to work with the program, engaging in strategies to reduce disincentives to participate.

Case management services: The provision of case management occurs (1) to identify
service needs before the move into permanent housing; and (2) to ensure clients
have access to resources necessary to sustain permanent housing including a source
of income through employment and/or public benefits (prior to or immediately after
the move into permanent housing); case management (to help solve problems that
may arise that threaten the clients' tenancy including difficulties sustaining housing);
interacting with the landlord; and connecting households with community-based
services (to meet long term support/service needs).

# 3. Vision

Programs are guided by the Community Shelter Board Governance Policies as adopted by the Board of Trustees.

Global Ends Policy: People who experience homelessness or are at imminent risk of homelessness will have access to community and system resources to resolve their immediate housing crisis and will transition from homelessness to stability.

### 4. Mission

The Community Shelter Board (CSB) creates collaborations, innovates solutions, and invests in quality programs in order to end homelessness in Columbus and Franklin County.

## 5. Federally Funded Program Information

The Emergency Solutions Grant (ESG) and Continuum of Care programs (CoC) provide funding for several programs within the CSB network of providers. All ESG and CoC-funded programs serve individuals or families that meet the definition of homelessness as defined by the Department of Housing and Urban Development (HUD) in 24 CFR 578.3, detailed below. Although households in all four of the below categories are eligible for homeless assistance under federal regulations, in Columbus and Franklin County provision of ESG and CoC type services will be prioritized for households that meet Category 1 (Literally Homeless) criteria because of resource constraints.

Category 1 – Literally Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 2 – Imminent Risk of Homelessness: An individual or family who will imminently lose their primary nighttime residence, provided that:

- a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance:
- b. No subsequent residence has been identified; and
- c. The individual or family lacks the resource or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

Category 3 – Homeless under Other Federal Statutes: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- a. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance:
- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- d. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Category 4 – Fleeing or Attempting to Flee Domestic Violence: Any individual or family who:

- a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within the individual or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- b. Has no other residence; and
- c. Lacks the resource or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Emergency Solutions Grants Program (ESG)

The Emergency Solutions Grants (ESG) program places an emphasis on helping people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness (housing first). The ESG program can fund emergency shelter, RRH, and Homeless Management Information System (HMIS) activities.

## Continuum of Care Program (CoC)

The Continuum of Care program is comprised of programs that offer housing and supportive services to formerly homeless individuals and families. The components of the CoC Program are: permanent housing, inclusive of permanent supportive housing and RRH, transitional housing and supportive services only programs.

#### 6. Recordkeeping

Homelessness status must be verified through recordkeeping and documentation procedures outlined by HUD in 24 CFR 576 and detailed below.

- Records for each individual or household receiving services under these Policies and Procedures must be completed and followed in accordance with the System-Wide Recordkeeping Checklist attached hereto as Attachment 1 and the Rebuilding Lives or Chronic Homeless documentation form attached hereto as Attachment 2.
- Each program must maintain and follow written intake procedures. The procedures
  must require documentation at intake of the evidence relied upon to establish and
  verify homeless status. The procedures must establish the order of priority for
  obtaining such evidence.
- Records contained in our local HMIS, Columbus Service Point, or comparable database used by victim service providers are acceptable evidence of third-party documentation.

Homeless	Recordkeeping/Documentation					
Status	(where <u>OR</u> is used it signifies the order of priority)					
(1). a & b.	HMIS record <u>or</u>					
Streets, shelter,	Verification of Street Homelessness form completed by an					
transitional	approved outreach worker					
housing,						
hotel/motel						
(1). c. Exiting an	Documentation of <u>a</u> or <u>b</u> above, prior to institution stay, <u>and</u>					
institution	Discharge paperwork or hospital exit paperwork or a written					
where he or she	referral from a social worker, case manager, or other					
resided for 90	appropriate official of the institution, stating the beginning and					
days or less	end dates of the time residing in the institution					

A client file checklist (Attachment 1) and/or the Rebuilding Lives or Chronic Homeless documentation forms (Attachment 2), dependent on program type, is to be completed and included in all program participant files. Each file must include documentation for all applicable items. In addition to evidence of homeless status or "at risk of homelessness" status, records must be kept for each program participant as specified under 24 CFR 576.500 and 24 CFR 578.103:

- The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant (in accordance with CSB Program Review and Certification [PR&C] Standard E13);
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions for:
  - Street Outreach, including engagement, case management, emergency health and mental health services and transportation (24 CFR 576.101);
  - Emergency Shelter component including essential service and shelter operations (24 CFR 576.102);
  - Homeless prevention component (24 CFR 576.103);
  - RRH assistance component (24 CFR 576.104);
  - Housing relocation and stabilization services including financial assistance costs, service costs, and maximum amounts and periods of assistance (24 CFR 576.105);
  - Short-term and medium-term rental assistance (24 CFR 576.106);
  - Leasing activities (24 CFR 578.49);
  - Rental assistance activities (24 CFR 578.51);
  - Supportive service activities (24 CFR 578.53);
  - Operating costs (24 CFR 578.55);
  - Administrative costs (24 CFR 578.59), the provision on determining eligibility and amount and type of assistance through evaluations of the program participant and re-evaluations for homelessness prevention and RRH assistance at 24 CFR 576.401 (a) and (b), and the provision on using appropriate assistance and services by connecting program participants to mainstream and other resources and housing stability case management at 24 CFR 576.401 (d) and (e):
  - Match requirements (24 CFR 578.73)
  - Program income (24 CFR 578.97)
- Compliance, where applicable, with the termination of assistance requirement in 24 CFR 576.402 and 24 CFR 578.91 stating if a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established that recognizes the rights of the individuals affected.
- Income eligibility documentation as outlined in 24 CFR 576.500, 24 CFR 578.103 and Section H of this Policy and Procedures document.

# II. Programs/Program Types

# **Summary of Assistance**

Type of Allowable Assistance	Security Deposit up to 2 months including last month's rent	First Month 's Rent	Rent assistan ce	Utility Depo sit	Curren t Utility Payme nt	Utility Arrearag es up to \$1000 or up to 3 months	Services
Prevention							90 days average
Emergency Shelter							32 days average
Outreach	V	V	V	V	V	V	Unlimited
DCA Transition (single adults and families) <sup>1</sup>	X	X	X	X	X	X	O days or based on program design (Navigator program)
DCA - RRH/Naviga tors(families )	X	X	X program depend ent	X	X	X	3-9 months
DCA – Stable Families	X	X	X	X	X	X	2-3 months
Transitional Housing <sup>2</sup>	X	X	X	X	X		24 months
Permanent Supportive Housing <sup>2</sup>	X	Х	X	X	X		Unlimited
RRH/Naviga tors	Х	X	Х	Х	Х		90 day average

<sup>&</sup>lt;sup>1</sup> No ESG funds are used towards the provision of rental assistance in the DCA Transition Program.

<sup>&</sup>lt;sup>2</sup> Eligibility is dependent on program type and funding source.

## **Prevention Programs**

## Overview/Purpose

In Columbus and Franklin County local funds are used to provide prevention assistance. ESG funds will not be used towards the provision of prevention services to at risk individuals and families.

Prevention programs will provide services to families to ensure:

- Families stabilize in their housing;
- · Children stabilize in their school; and
- Families increase their knowledge of community resources.

# A. Stable Families Prevention Program

Referrals for the Stable Families Prevention Program come through the HandsOn Central Ohio Homeless Hotline (HH). Families call the HH and intake staff assess the family and make a referral to the program, if it seems that the family qualifies for the program.. Stable Families staff will call the family to complete a phone screening (attached hereto as Attachment 18) and a Barriers to Housing Stability Assessment (attached hereto as Attachment 19) to determine pre-eligibility. If family meets eligibility requirements, a Stable Families case manager will complete a family assessment and enrollment form (attached hereto as Attachment 20) and begin to work with the family immediately. This process will assess the family's commitment to the program and whether the program services are adequate to stabilize the family in housing and children in school.

# Eligibility Criteria

- Stable Families prevention program will serve families who are at risk of losing their housing and:
- Have at least one or more children (under age 18) in the legal custody of one or more adults in the home. Family can consist of 2 parents, 1 parent, same sex partners, intergenerational and/or extended family members, unmarried couples with children, and adults who are not biological parents of children;
- Family must be in their own housing and be at imminent risk of homelessness. The
  imminent risk of homelessness must be documented with an eviction notice, 3 day
  notice, a host family provided letter or any such document showing the family can no
  longer stay in their current residence;
- Family income must be below 30% of the AMI;
- Family must have an income; only families currently residing in subsidized housing can be accepted into the program with zero income
- Family must receive an overall barrier assessment level 2 (moderate barriers-able to obtain/maintain housing with moderate one-time or brief transitional support);
- Family must have, at minimum, 3 housing barriers listed on the Stable Families Screening form;
- Family has not utilized any homeless services within the last 6 months;
- Family has never used Stable Families resources; and
- Family must be willing to participate in case management services.
- Families with school-age children and/or residing in a household with one or more additional families will be prioritized for services.

### Eligible Activities

- Case management
- Education services
- Employment support, benefit referrals and other income supports
- Legal services
- Life skills training
- Mental health services, referral and support
- Substance abuse services, referral and support
- Pregnancy support
- Parenting classes
- Domestic violence referrals
- Security deposits
- Rental assistance
- Utility assistance
- Utility arrearages
- Utility security deposits
- Rental application fees
- Housing search and placement
- Mediation

Families receive, at minimum, weekly case management for an average of 2-3 months. Stable Families Case Managers complete a 12 month follow up with each family to determine family stability and success.

#### Recordkeeping

Each program participant must have documentation of the following:

- Documentation of eligibility
- Written intake record including intake interviews and records of services provided
- Appropriate and successful referral to other programs in cases where the program was not able to accommodate a program participant
- Individualized Housing Stabilization Plan
- Documentation of progress made towards the Individualized Housing Stabilization Plan
- Documentation of income and assets
- Documentation that supports data collected and entered into Columbus Service Point
- Records are documented in accordance with CSB PR&C Standards E13, E14, F7, G1, G6, G7, and M3(b).

## Termination

If an enrolled family refuses to comply with the Stable Families Agreement, the family may be terminated from the program. The following may constitute non-compliance:

- Repeated failure to keep appointments
- Failure to reveal relevant criminal/debt history

- Failure to provide required documentation
- Failure to earnestly seek housing
- Repeated failure to accept suitable housing
- Failure to earnestly seek or willingly maintain employment
- Refusal to apply for benefits for which they may be eligible
- Refusal to attend assessment or treatment for possible drug or alcohol abuse or mental health instability
- Refusal to work with the Franklin County Children Services (FCCS) Case Manager if involved in an open FCCS case
- Refusal to keep children in school
- Consistent non-cooperative behavior as demonstrated by one or more of the items listed above, or items listed on the individualized housing stabilization plan.

All exits require completion of the Letter of Termination.

- Successful Exits: Families successfully exit the program when they have achieved stability in permanent housing, and have the necessary community based supportive services in place to help maintain their housing.
   Note: Families may also be exited from services for cause but still retain a successful housing exit if the family has maintained housing and will continue to live in the unit the Stable Families program assisted in stabilizing upon exit.
- Unsuccessful exits: Families may be unsuccessfully exited from the program if they are not able to resolve their housing crisis within the expected timeframe or if the family loses their housing prior to Stable Families service termination. Individual Stable Families Case Managers cannot unilaterally close a case as an unsuccessful exit. It is the responsibility of the supervisor to declare a case unsuccessfully closed. Note: If a family being referred does not appear to be capable of maintaining permanent housing within 3 months, the Stable Families Case Manager should consider recommending to the supervisor that the household be exited as an unsuccessful exit.

# **Effectiveness & Evaluation**

The effectiveness of the program is analyzed at the SFOW (Stable Families Operation Workgroup) meeting via a presentation by the CSB Program Manager. Implementation of policies and procedures are evaluated annually by the SFOW meeting group under the leadership of the CSB Program Manager, Communities in Schools Director of Program Management, Gladden Community House Vice President of Community Services and YWCA Family Center Family and Housing Advocacy Manager who duly consider recommendations for improvements. CSB will evaluate the effectiveness of the program through:

- Monthly monitoring reports:
- Quarterly indicator reports;
- Program audits as needed, and
- An annual evaluation of the program as part of CSB's Annual Program Evaluation.

# B. Other Homelessness Prevention Programs

Gladden Community House's Homelessness Prevention Program assists families and individuals who are homeless or at risk of becoming homeless within the neighborhoods served by Gladden Community House. Once eligibility is determined, clients and staff develop a short-term action plan to work towards securing or maintaining permanent housing. Clients receive individualized case management services, mediation services, housing placement assistance, budget counseling, and assistance with applications for Franklin County Department of Job and Family Services, as well as Gladden Community House's own financial assistance, if necessary. Staff also assists clients in accessing other possible sources for financial assistance and other community-based services to help maintain their housing. These include Legal Aid, COMPASS, IMPACT, JOIN, and the Salvation Army. Follow-up services are provided to clients on a case-by-case basis.

# **Emergency Shelter Programs (Single Adult and Families)**

## Overview/Purpose

Emergency shelter programs serve households (either individuals or families) that meet the definition of homelessness as defined by HUD in 24 CFR 576.2. Households served by emergency shelter programs lack a fixed, regular and adequate nighttime residence, cannot be served by other programs or resources, and have no other options for overnight shelter. Households are referred to emergency shelter programs after exhausting all available options for diversion, as determined through triage procedures by the Coordinated Point of Access/Homeless Hotline. A standardized triage form is customized to the target population (attached hereto as Attachment 3 and 4). Households must be assessed, prioritized and reassessed for essential services in accordance with CSB PR&C Standards E11, G1, G2, G6, and G7.

Emergency shelters are funded using local public and private funds and federal Emergency Solutions Grant (ESG) funds. CSB restricts the use of ESG funds to exclusively pay for costs related to shelter operations, as noted below under eligible shelter activities.

### Eligibility Criteria

Single Adult Emergency Shelter

The single adult shelters serve homeless individuals that meet the following criteria:

- 18 years of age or older, and able to care for him/herself(self-caring);
- Do not have custody of minor children upon entry;
- Lack a fixed, regular, adequate nighttime residence, including those staying in a public or private place not designated for, or ordinarily used as a regular sleeping accommodation for, human beings;
- Currently in Franklin County;
- Cannot be more appropriately served by another program such as Emergency Food and Shelter Program (EFSP) or system of care;
- Have no other options or resources available for overnight shelter in this or another county;

- Are not currently under a specific shelter restriction;
- Once identified, victims of domestic violence are referred to a local domestic violence shelter.
- Not a Tier III sex offender.

The shelters administer a Vulnerability Assessment (attached hereto as Attachment 5) for all single adults that enter shelter and identify individuals who have the highest barriers to housing and are therefore likely to be homeless the longest. Individuals who complete the Vulnerability Assessment and meet the definition of Chronically Homeless, as defined by the U.S. Department of Housing and Urban Development, are prioritized for housing services.

## Family Emergency Shelter

The YWCA Family Center and the Van Buren Family Shelter serve homeless families with children up to age eighteen. Families served must consist of one or more minor children (18 or under, 18-year-old must be enrolled in high school) in the legal custody of one or more adults (not to exceed three adults) who, prior to losing housing, were living together and working cooperatively to care for the children. This includes 2-parent and 1-parent families, including those with same sex partners, families with intergenerational and/or extended family members, unmarried couples with children, families that contain adults who are not biological parents of the children and other family configurations. Eligibility criteria are monitored in accordance with CSB PR&C Standard E10. Family shelters serve homeless families that:

- Lack a fixed, regular, adequate nighttime residence, including those staying in a place or area not meant for human habitation;
- Currently reside in Franklin County;
- Cannot be more appropriately served by another prevention program or system or care:
- Have no other options or resources for emergency shelter; and
- Are not currently under a system-wide service restriction
- Once identified, victims of domestic violence are referred to a local domestic violence shelter.
- Not a sex offender

#### Eligible Activities

- A. Essential Services
  - Case management including the usage of the Coordinated Point of Access/Homeless Hotline
  - Childcare
  - Education services
  - Employment assistance and job training
  - Outpatient health services
  - Legal services
  - Life skills training
  - Mental health services
  - Substance abuse services
  - Transportation

## B. Shelter Operations

Costs to operate a shelter (i.e. rent, utilities, supplies, etc.) (CSB restricts the use
of ESG funds to pay, exclusively, for costs related to shelter operations, as noted
below under eligible shelter activities.)

## Recordkeeping

Each program participant must have documentation of the following:

- Written intake record including intake interviews and records of services provided
- Appropriate and successful referrals to other programs in cases where the program was not able to accommodate a program participant
- Individualized Housing Stabilization Plan
- Documentation of progress made towards the Individualized Housing Stabilization Plan
- Vulnerability Assessment (Heads of Household only)
- Documentation that supports data collected and entered into Columbus Service Point
- Service Restriction documentation (if applicable)
- Records are documented in accordance with CSB PR&C Standards E13, E14, F7, G1, G6, G7, and M3(b).

### Termination

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

If a family or individual refuses to comply with shelter rules, the family or individual may be terminated from the program. The following determinations (as well as additional areas of concern determined on an individual basis) may constitute non-compliance:

- Failure to make progress on individualized housing stabilization plan (IHSP) after 35 days (in accordance with CSB PR&C Standards G1, G2 & G6);
- Failure to earnestly seek housing, in accordance with the participant's IHSP (in accordance with CSB PR&C Standard G6);
- Failure to earnestly seek or willing to maintain employment, in accordance with the participant's IHSP (in accordance with CSB PR&C Standard G6); and
- Consistent non-cooperative behavior as determined and documented by shelter staff (in accordance with CSB PR&C Standard F6).

Shelter programs have a standardized service restriction policy to address certain unacceptable behaviors (attached hereto as Attachment 11). The individual or household will be given written notice containing a clear statement of the reason for service termination. A family or individual have the opportunity to appeal termination of services through the shelter's appeal process. All shelters need to have an established and posted

appeal process. In addition, any individual requesting an appeal must have his/her appeal heard prior to being asked to leave the shelter. Grievance, termination and appeal processes are conducted in accordance with CSB PR&C Standards E7, F5, F6 and F7.

## **Outreach Program**

#### Overview/Purpose

Outreach programs serve households (either individuals or families) that meet the definition of homelessness as defined by HUD in 24 CFR 576.2. Households served by outreach programs lack a fixed, regular and adequate nighttime residence. The target population is adults living in places not meant for human habitation, including but not limited to on the streets, on the land in camps, in cars, city and county parks, and abandoned buildings. CSB will not use ESG funds towards the provision of outreach services. Local public funds support the outreach function at CSB.

## Eligibility Criteria

Outreach programs will serve individuals that:

• Lack a fixed, regular, adequate nighttime residence, including those staying in a place or areas not meant for human habitation.

## Eligible Activities

- Engagement
- Case Management
- Emergency Physical Health Services
- Emergency Behavioral Services
- Transportation

## Recordkeeping

Each program participant must have documentation of the following:

- Written intake record including intake interviews and records of services provided
- Appropriate and successful referrals to other programs in cases where the program was not able to accommodate a program participant
- Individualized Housing Stabilization Plan
- Documentation of progress made towards the Individualized Housing Stabilization
- Vulnerability Assessment (Heads of Household only)
- Documentation that supports data collected and entered into Columbus Service Point
- Service Restriction documentation (if applicable)
- Records are documented in accordance with CSB PR&C Standards E13, E14, F7, G1, G6, G7, and M3(b).

#### Termination

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a

program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

## **RRH/Navigators for Families**

#### Overview/Purpose

RRH/Navigator programs will provide services to families in a collaborative manner to ensure that families experiencing homelessness:

- Have their basic needs met in a non-congregate environment (individual, SRO or shared unit);
- Move to positive, stable housing;
- Have access to resources and services as needed to maintain housing; and
- Do not re-enter the emergency shelter system.

RRH/Navigator programs use a variety of local public and private, state and federal ESG funding. The Job2Housing Program, which does not utilize ESG funding but uses federal SHP funding, provides services to families with children that meet the HUD RRH eligibility threshold, have insufficient income to afford housing and are committed to pursuing employment to achieve family self-sufficiency. Case management and financial assistance can be provided for up to 6 months. The policies and procedures governing the Job2Housing program are attached hereto as attachment 21.

ESG-funded RRH/Navigator programs serve families that meet the definition of homelessness as defined by HUD in 24 CFR 576.2. Families served by RRH/Navigator programs will have one or more barriers to obtaining permanent housing; an identified need(s) for supportive services; and earn income below 35% of the Area Median Income (AMI) at intake as determined by HUD and updated annually. Homeless families may participate in RRH/Navigator programs if they have barriers to stability that can be addressed in a community-based setting once they are housed. Such families must be capable of achieving stability with the support of community resources. Those who cannot reasonably be expected to achieve stability within the timeframe of RRH/Navigator services are referred to more appropriate supportive housing programs (permanent or treatment).

All RRH/Navigator referrals for families come directly from the YWCA Family Center or the Van Buren Family Shelter after participating in an assessment. These families generally have numerous barriers to housing: multiple evictions, drug and alcohol addictions, criminal histories, mental health issues, absence of a high school diploma or GED, and poor employment histories. The ultimate goal is for the family to move in and maintain a permanent residence in fair market housing.

Assistance given as part of the RRH/Navigator program is provided in an efficient and costeffective manner and is guided by the following values:

- Housing is a basic human need.
- Shelters are not an adequate response to homelessness.
- Housing should be safe, decent, and affordable.

- Families are better off in a "home-like" environment rather than an institutional setting.
- Meeting basic needs is essential in order to address psychosocial, emotional and/or parenting issues.
- Most families are able or can learn to set their own goals, manage their own homes, and take charge of their lives.
- Personal responsibility for self and community is encouraged and the ability to make choices is respected.
- Families should have input in the selection of housing.
- Most homeless parents want to keep their children and, with support, are capable of adequate parenting.
- Families should remain together, if at all possible, when it is in the best interest of the child(ren).
- In order to support a child, it is necessary to support the child's parent(s) or long-term caregiver(s).
- Chemical addiction requires recovery, but the most effective path to recovery is individualized and varies among individuals.
- Individuals are more likely to maintain recovery if they have housing that promotes clean and sober living.
- Recovery is a life-long non-linear process.
- Support and recovery services should start with an individual's/family's strengths.
- Healthy families create healthy communities, and healthy communities support healthy families.

# **Eligibility Criteria**

RRH/Navigator programs will serve homeless families who can be expected to achieve stability within 3-9 months and:

- Are clients of the YWCA Family Center or the Van Buren Family Shelter;
- 30 day resident of Franklin County
- Receive a standard assessment (attached hereto as Attachment 3) that recommends RRH/Navigators as the best approach towards housing stability for the household;
- Desire to obtain and maintain employment and housing;
- Are willing to partner with a Case Manager for the time that is required to attain and establish maintenance of their housing;
- Have or can have, within 3-9 months, income and/or community based supports sufficient to be independent and stable;
- Have or can have, within 3-9 months, community based supports to maintain housing;
- Are unable to obtain and maintain an apartment without assistance due to barriers primarily related to income, employment, debt, criminal history, and/or previous evictions:
- No prior homeless system Direct Client Assistance (DCA) within the past 18 months;
- Have not been previously exited from a RRH/Navigator program within the last year.
- Have income intake below 35% AMI using the standard for calculating annual income under 24 CFR 5.609

#### Prioritization

Families referred to a RRH/Navigator program should meet the following prioritization guidelines:

- Family must have 2 meetings with an advocate, or at least a length of stay of 5 days that is showing documented progress;
- Demonstrated 6 months of permanent housing maintenance within the last 5 years (lease or financial contribution);
- If no income, willingness to seek work, involvement in workforce development or disability benefits programming;
- If transitional age youth (TAY), age 18-24, attempt of linkage with TAY case management program;
- If demonstrated mental illness and/or substance abuse issue, completion of diagnostic assessment and initiation of USHS application.

RRH/Navigator providers are willing to look outside of prioritization guidelines if the referral need is not being met at the time of the request

Once a RRH/Navigator provider completes an intake with a referred family, the time it takes to move the family into permanent housing cannot exceed 30 days.

Families are not referred to a RRH/Navigator program if they:

- Are determined suitable to directly move into permanent housing with no financial assistance, or limited financial assistance, from sources such as the Direct Client Assistance (DCA) Transition Program, or
- Are determined unable to address barriers to housing due to a disabling condition and are eligible for entry into a Permanent Supportive Housing program with supportive services attached.

#### Effectiveness & Evaluation

The effectiveness of the RRH/Navigator system is analyzed at the Family Services Operations Workgroup (FSOW) meeting via a presentation by the CSB Program Manager. Implementation of policies and procedures are evaluated annually by the FSOW meeting group under the leadership of the CSB Program Manager, the Salvation Army Franklin County Housing Coordinator, the Homeless Families Foundation Family Services Director, and Volunteers of America of Greater Ohio Family Service Director who duly consider recommendations for improvements. CSB will evaluate the effectiveness of the program through:

- Monthly monitoring reports;
- Quarterly indicator reports;
- Program audits as needed, and
- An annual evaluation of the program as part of CSB's Annual Program Evaluation.

The needs of the homeless community are annually assessed via the CSB PM's analysis of clients served and the FSOW meeting group's assessments of grievance actions. The information gleaned from these processes is used to determine program direction and quality improvements.

## **Eligible Activities**

Service needs, provided under the Housing Relocation and Stabilization Services category as addressed in each participant's individualized housing stabilization plan (IHSP) are as follows, but not limited to:

- Case management services
  - o Pre-placement Services:

Navigators are the primary Case Manager & advocate for all issues pertaining to permanent housing. The family shelter addresses all hospitality issues (sleeping arrangements, food, etc.). While residing at a family shelter, the family is entitled to the same rights and privileges as any other family shelter resident, including use of equipment such as fax or telephone, bus tickets, child care, food, etc. Individualized Housing Stabilization Plans will be jointly created by the Navigator and YWCA Case Manager in partnership with the family. Family shelter case workers will keep the Navigator informed at all times of any in-house logistics, challenges, or the emergence of new issues of which the Navigator would otherwise be unaware, especially those that may impact housing. The Navigator will communicate frequently with family shelter representatives, informing them of goal progress and any challenges as they arise. This is accomplished at the weekly Program Administration Meeting, or sooner if situations warrant. Clients will be assisted through the timely assessment of housing barriers and will be provided with lists of appropriate housing options that meet their individualized needs, with the Navigator acting as advocate when needed. Assistance to obtain needed documentation, appointments with other community agencies, and financial assistance will be provided. Families must keep the Navigator informed of their goal progress and, if leaving the shelter, provide contact information.

#### Post-Placement Services:

Navigators will provide *intensive* services to families from the time the family is enrolled in the RRH/Navigator program until they can successfully maintain housing. In the short-term program, this does not require more than 90 days post placement in housing. "Intensive services" implies that the family and Navigator will be in contact at least weekly (or more often when indicated), typically through a home-based visit by the Navigator. At a minimum, Navigators will monitor the following: rent & utility payments including contact with the family's landlord, lease compliance, employment search or attendance, school enrollment for children, and attendance at scheduled appointments with other community agencies. Advocacy and other assistance will be offered as needed. Only in extenuating circumstances, as approved by the weekly Program Administration Meeting members, may a family receive intensive support services for up to 6 months.

## Aftercare services:

Aftercare services may be provided for up to an additional 3 months if needed. Unless problems exist, a monthly phone call to check on the family's stability may be sufficient with additional face-to-face contact occurring monthly. Aftercare may also be provided as requested by Columbus Metropolitan Housing Authority (CMHA) or Community Properties of Ohio (CPO), per agreements made between these housing partners. Aftercare for families that enter into housing with CMHA or CPO will be made available until the family is no longer considered to be in

aftercare status, per the agreements made between the housing partners and the RRH/Navigator program.

- Life-skills
- Mental health services, referrals and support
- AOD referral and support
- Pregnancy support
- Parenting classes
- Childcare
- Domestic violence referrals
- Employment support, benefit referrals and other income supports
- Education support for adults and children
- Security deposits and application fees
- Moving expenses
- ID fees, background check fees
- Last month's rent (if included in the security deposit)
- Utility assistance (for current charges)
- Utility arrearages
- Utility security deposits
- Rental application fees
- Housing search and placement
- Mediation

Families receive, at a minimum, monthly housing stability case management for an average of 3-4 months (not to exceed 9 months). ESG funds will be used towards the provision of the above services.

The provision of case management occurs to: (1) identify service needs before the move into permanent housing; (2) ensure families have a source of income through employment and/or public benefits after the move into permanent housing; (3) help solve problems that may arise which threaten the clients' tenancy, including difficulties sustaining housing or interacting with the landlord; and (4) connect families with community based services to meet long term support/service needs. Case managers will work with the family to create a discharge plan to address maintaining permanent housing once assistance ends.

The program participant eligibility and the types and amounts of assistance needed will be assessed every 90 days of the household's participation. Termination is required if the household is no longer eligible for services, this excludes having an AMI at or greater than 30%.

### Recordkeeping

Each program participant must have documentation of the following:

- Written intake record including intake interviews and records of services provided
- Appropriate and successful referrals to other programs in cases where the program was not able to accommodate a program participant
- Individualized Housing Stabilization Plan

- Documentation of progress made towards the Individualized Housing Stabilization
   Plan
- Documentation of income and assets
- Documentation that supports data collected and entered into Columbus Service Point
- Service Restriction documentation (if applicable)
- Records are documented in accordance with CSB PR&C Standards E13, E14, F7, G1, G6, G7, and M3(b).

## Termination

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

The following may constitute non-compliance (this list is not exhaustive):

- Repeated failure to keep appointments
- Failure to reveal relevant criminal/debt history
- Failure to provide required documentation
- · Failure to earnestly seek housing
- Repeated failure to accept suitable housing
- Failure to earnestly seek or willingly maintain employment
- Refusal to complete & sign a Housing Checklist attached hereto as Attachment 6 if a formal housing inspection is not completed
- Refusal to apply for benefits for which the household may be eligible
- Refusal to attend assessment or treatment for possible drug or alcohol abuse or mental health instability as identified on the individualized housing stabilization plan
- Refusal to work with the Franklin County Children's Services Case Manager if involved in an open FCCS case
- Refusal to keep children in school
- Consistent non-cooperative behavior as demonstrated by any or a combination of the items listed above or items listed on the individualized housing stabilization plan.

If the Navigator and members of the Program Administration Meeting determine that a family is non-compliant with the RRH/Navigator Program Agreement, the following action will be taken:

If the family is still residing at a family shelter, the family will be unenrolled from the RRH/Navigator program and referred by the family shelter Family Advocate to another appropriate next-step housing option. If the family has already moved into permanent housing, the family will be unenrolled from the RRH/Navigator program and will be ineligible for further financial and/or supportive services from the RRH/Navigator program.

All exits will require completion of the Letter of Termination.

- Successful Exits: Families successfully exit the program when they have attained permanent housing and necessary community-based supportive services are in place to help the family maintain their housing.
  - Note: Families may also be exited from services for cause but still retain a successful housing exit *if* the family has attained housing *and* upon exit will continue to live in the unit the RRH/Navigator program assisted in securing.
  - Families that have an income at or above 30% AMI at the  $90^{th}$  day assessment have to be exited from the program. The exit at termination will be successful if the household continues to live in the unit the RRH/ Navigator program assisted in securing.
- Unsuccessful exits: Families may be unsuccessfully exited from the program if they
  are not able to resolve their housing crisis within the expected timeframe as defined
  by the individualized housing stabilization plan in conjunction with supportive
  services, or if the family loses their housing prior to RRH/Navigator program service
  termination. Individual Case Managers or other provider staff cannot unilaterally
  close a case as an unsuccessful exit. It is the responsibility of the Program
  Administration Meeting members to declare a case unsuccessfully closed.

The required formal process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination:
- A review of the decision, in which the program participant is given the opportunity to
  present written or oral objections before a person other than the person (or a
  subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

CSP Site Administrators oversee the closing of CSP entries (Service Record, Entry/Exit Records).

For RRH/Navigator programs, Case Managers will conduct exit interviews for each household exited, utilizing an exit survey. The exit survey must include client verification that any religious activities have been optional. Clients are provided with stamped return envelopes to the administrator of the RRH/Navigator program in which they participated, who will prepare a summary for presentation to the FSOW group to review. Exit surveys, as a whole, are analyzed quarterly.

Supplemental documents regarding administrative functions, program flow and admission and re-entry are attached hereto as Attachments 7, 8, and 9.

### RRH/Navigator Program for Single Adults

## Overview/Purpose

The Navigator program serves individuals residing in single adult shelters that meet the definition of homelessness as defined by HUD in 24 CFR 576.2. Case managers called navigators will provide intensive services focused on ending the homeless crisis quickly and stabilizing the person in housing. They will also link people to specialty services to assure housing stability, like employment and job training, medical care, mental health and housing

resources. Navigators will continue to work with people after they are housed to provide support to maintain stable housing. Individuals served must earn income below 30% of the Area Median Income (AMI) as determined by HUD.

#### Eligibility Criteria

The navigator program serves single adults who are residents of a single adult shelter and that meet the following criteria:

- 18 years of age or older and able to care for him/herself (self-caring);
- Do not have custody of minor children upon entry;
- Currently residing in a single adult emergency shelter;
- Currently in Franklin County;
- Cannot be more appropriately served by another program such as Emergency Food and Shelter Program (EFSP) or system of care;
- Are not currently under a specific shelter restriction;
- Once identified, victims of domestic violence are referred to a local domestic violence shelter;
- Not a Tier III sex offender.

The Navigator's role is to effectively support a homeless individual by ensuring a successful exit to stable housing within a short period of time. It is also expected that the individuals housed are able to maintain stable housing, and that the overall rate of return to homelessness after exit from the program is low.

The Navigator will begin engagement with the client while the client is in an emergency shelter in Franklin County. Navigators will engage sheltered individuals within five (5) days from entry into emergency shelter. Navigators will work in teams that may be specialized to meet specific needs of the homeless population. Navigators will transport or coordinate transportation for individuals with whom they are working.

### Eligible Activities

Service needs of the target population are as follows (but not limited to):

- Case management services
- Life-skills
- Physical Healthcare referrals
- Mental health services, referrals and support
- AOD referral and support
- Employment support, benefit referrals and other income supports
- Education support

The Navigators will cultivate relationships with landlords and develop a successful process for accessing safe, affordable housing on behalf of low-income tenants. Navigators will be expected to work with the homeless individual for placement into permanent supportive housing, if necessary. Individuals will be housed within twenty-eight (28) days from their initial engagement with the Navigator program.

Once housed, Navigators help participants maintain permanent housing through the creation and development of individualized housing stabilization plans and follow-up

services. Navigators will work with clients for up to ninety (90) days after their entry into permanent housing, or longer if necessary.

The Navigators administer a Vulnerability Assessment (attached hereto as Attachment 5) for all single adults that enter shelter and identify individuals who have the highest barriers to housing and are therefore likely to be homeless the longest. Individuals who complete the Vulnerability Assessment and meet the definition of Chronically Homeless, as defined by the U.S. Department of Housing and Urban Development, are prioritized for housing services.

## Recordkeeping

Each program participant must have documentation of the following:

- Written intake record including intake interviews and records of services provided
- Appropriate and successful referrals to other programs in cases where the program was not able to accommodate a program participant
- Individualized Housing Stabilization Plan
- Documentation of progress made towards the Individualized Housing Stabilization Plan
- Documentation of income and assets
- Documentation that supports data collected and entered into Columbus Service Point
- Service Restriction documentation (if applicable)
- Records are documented in accordance with CSB PR&C Standards E13, E14, F7, G1, G6, G7, and M3(b).

The program participant eligibility and the types and amounts of assistance needed will be assessed every 90 days of the household's participation. Termination is required if the household is no longer eligible for services.

#### Termination

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

#### **Direct Client Assistance**

Direct Client Assistance (DCA) applications can be found on <a href="www.csb.org">www.csb.org</a> under Resources for Our Partners, Useful Things. All submitted applications must be complete.

Starting October 2013, the Area Medium Income (AMI) at the time of DCA application must be less than 35% in the past 30 days for a client to be eligible for consideration for DCA assistance (prevention programs have a 30% AMI limit for income in the past 30 days).

## **Agency Partners**

Fiscal Lead: Community Shelter Board Supportive Service Providers:

- AccessOhio
- Capital Crossroads\*
- CHOICES\*
- Columbus Area Integrated Health Services
- Community Housing Network
- Lutheran Social Services and Faith Mission
- Friends of the Homeless
- Homeless Families Foundation
- Southeast, Inc.
- Maryhaven
- National Church Residences
- The Open Shelter\*
- The Salvation Army
- Volunteers of America
- YMCA
- YWCA

## \* Denotes non-funded partner agencies

Non-funded partner agencies must have an approved and current DCA Agreement with CSB in order to access DCA Program funds. Only caseworkers or supervisors who have attended DCA Program training, or have been trained by a supervisor at their agency, and have a valid authorization on file with CSB may submit DCA applications, pick up checks, or signoff on DCA applications for financial assistance.

Participants in the DCA Program may receive financial assistance for direct housing costs to obtain and maintain housing. After a client has leveraged all other available resources, completed an application, submitted all necessary documentation, and has been deemed eligible for the DCA Program, the application may be submitted to CSB for processing.

Payments cannot be made directly to eligible individuals or families. Checks will be sent to landlords, utility companies, or any other third party entity, as applicable.

Client financial assistance may be provided for a portion of or all housing expenses. In certain rare cases, with appropriate documentation and approval by the Program Manager-DCA, portions of subsequent months' rent, arrearages, or prior eviction costs may be paid with DCA Program funds for the applicant to access and maintain housing, especially when the client(s) is moving into subsidized housing (e.g. arrearages owed to CMHA). Designated staff should only recommend the amount of funds essential to either get a participant into housing or maintain housing before income is sufficient to afford total monthly rental costs. Only those portions of costs that cannot be paid through other sources are eligible for DCA Program assistance. For complete lists of allowable and unallowable costs, see Allowable & Non-Allowable Costs section.

Application for utility assistance will only be considered when other resources cannot be leveraged and (1) the participant's inability to pay the utility bill prevent or significantly delay move-in; (2) an outstanding bill will be transferred to the new account <u>and</u> will increase monthly housing costs beyond the applicant's ability to pay; or (3) the participant's inability to pay the utility bill will cause the participant to become homeless. Documentation must be provided with the DCA application and documented in CSP as to what additional resources were pursued for utility costs.

Designated staff, along with their supervisors, are responsible for recommending the amount of assistance requested based on a variety of factors including, but not limited to: household size and income; length of time client has been receiving income; other debts or costs the client is incurring; cost of the housing; other financial assistance that will be accessed; and any housing subsidy (e.g. Section 8) to be utilized. *Participants are expected to bear some responsibility for move-in and other costs.* Financial assistance may also be limited by the amount of funds available, as determined by CSB. The DCA Program is not designed, nor is it funded, to meet all the costs involved with establishing housing.

A prior use of DCA Program funds does not necessarily preclude a participant from applying again. If the individual or family has made a successful exit into permanent or transitional housing for at least 12 months and has lost such housing and is once again otherwise eligible for the program, applications will be considered on a case-by-case basis. "Good case management" including but not limited to assessment of the client's needs, referral to appropriate resources and services, and appropriate housing referral should be evident in the application and case notes. Stable Families participants can receive additional month's assistance within the 6 months of case management, as needed.

In the event of a subsequent financial assistance request, all verification documentation must be current and included with the application within the guidelines previously outlined.

### <u>Direct Client Assistance – Stable Families Program</u>

The Direct Client Assistance (DCA) Stable Families Program provides short-term rental assistance, including utility deposits, to enable families at risk of becoming homeless and served by the Stable Families programs to move to or sustain permanent housing. CSB will not use ESG funds towards the provision of DCA Stable Families assistance and local, United Way of Central Ohio funds will be used instead. The average amount of financial assistance is around \$1,000.

#### Direct Client Assistance – Transition Program

The Direct Client Assistance (DCA) Transition Program provides short-term rental assistance, including utility deposits, to enable persons residing in emergency shelters or experiencing street homelessness (outreach) to move into permanent housing. Working in partnership with supportive services agencies, shelter and outreach agencies in Franklin County, the Community Shelter Board provides financial assistance to individuals and families moving into fair market rent or subsidized housing and Rebuilding Lives units. CSB will not use ESG funds towards the provision of DCA Transition Program assistance, and local, private and public funds will be used instead. Effective 12/2/13, the maximum amount of financial assistance is \$600 for singles, and \$1000 for families.

## <u>Direct Client Assistance - RRH/Navigator Program</u>

The Direct Client Assistance (DCA) RRH/Navigator Program provides short-term rental assistance, including utility deposits, to enable persons residing in family emergency shelters to move into permanent housing while participating in RRH/Navigator programs. Working in partnership with supportive services agencies and shelter agencies in Franklin County, the Community Shelter Board provides financial assistance to families moving into fair market rent or subsidized housing and Rebuilding Lives units.

Housing should be mutually agreed upon by both the Navigator and the family's Head of Household. At a minimum, housing should be clean, decent, well-maintained, affordable, and in a neighborhood that meets the needs of the family. A formal housing inspection, including a lead-based paint visual assessment, conducted by a case manager or professional housing inspector must be completed. The inspection must be documented using the CSB Housing Inspection Form (attachment 25).

Locating adequate housing is a mutual responsibility of the family and the Navigator. The Navigator should use all resources possible to find housing, including direct contact with landlords if advocacy is needed. If necessary, transportation should be provided to help families visit the units and complete applications for housing. Financial assistance for application fees is available to families. The Navigator should keep abreast of current rental markets and problematic landlords or landlords with questionable practices, and appropriately refer families to partnering landlords. Referrals will not be made to landlords that have repeatedly proven uncooperative with CSB or the partner agency, have refused to reimburse due funds, do not adequately maintain properties, or have otherwise violated tenants' rights.

Families originally determined not to be eligible for subsidized housing may simultaneously seek housing via CMHA and private Section 8 landlords, submit applications, and be placed on the current waiting list(s), in addition to seeking market rate housing. A family shelter Resource Specialist should assist subsidy-ineligible families whose eligibility has changed to apply to CMHA or other subsidized housing programs partnering with the family shelter. The Navigators should assist families with applications to all appropriate landlords. Navigators should provide participants the Legal Aid brochure explaining tenants' rights and also review leases with clients before they sign.

### Eligibility Documentation for DCA Assistance

- A. Verification of head of household's identity. (*Maintained in agency case file*) The head of household must provide current legal proof of his or her identity, such as a state-issued photo I.D. or social security card.
- B. Have a regular, verifiable income. (*Provide a copy of documentation to CSB. Income must be verified even if it is zero.*) Income in the past 30 days from the date of the DCA application must be less than 35% AMI in order to be considered for DCA assistance and below 30% AMI to be considered for prevention assistance.
- C. Income sources may include, but are not limited to: wages from employment; TANF/OWF, veteran's benefits, pensions; welfare benefits; Social Security benefits; or disability benefits. Food stamps are <u>not</u> considered a source of income in eligibility determination, but should be documented in a text box on the Calculation Sheet in order to reflect additional resources that contribute to stable housing.

Income must be verified for all adult members (18 years of age and older) of the household. One of the following income documentation types is sufficient. Income documentation that does not meet the standard will not be accepted and the DCA application will be denied and will be returned to the service provider.

a. Pay Stub: 2-3 consecutive pay stubs with at least one pay stub no more than 30 days old from the pay period end date.

Copies of paychecks <u>are not</u> acceptable because the paychecks do not provide the necessary information for income calculation. The pay stub is needed to show hours and pay rate.

- b. Verification of Income/Employment or letter from the employer, written and dated within the past 30 days prior to submission of the DCA application date, and contains the following information:
  - Client's name:
  - Hours worked per week (total, average or range);
  - Pav rate:
  - Name, address and phone number of employer; and
  - Signature of person writing the letter.
- c. Benefits verification: Statement/document must be dated within the last 90 days. One or more of the following statements/documents are acceptable. The statement/document <u>must</u> contain the client's name, amount received per "benefit period," the frequency of payment, name of agency, and a phone number where such information may be verified if necessary.
  - Child support
  - Disability
  - Veteran benefits
  - Pension benefits
  - Unemployment
  - Social Security benefits
  - TANF/OWF benefits

Declaration of Zero Income: If the client is declaring zero income, the Self Declaration of Income form must be completed with an explanation of why the client is declaring zero income and how the client will sustain housing. Clients that are declaring zero income will be verified with intake documentation and information. Declaration of Zero Income should only be used on a limited basis.

Assistance may be provided to clients who have minimal or no income but are moving into subsidized housing units. Designated staff should note how the client plans to pay expenses for which they are responsible (i.e., utilities, client portion of rent if any).

Where all or some portion of income is time-limited, set to expire (e.g., Workers Compensation or unemployment insurance), or irregular, the designated staff member

should ensure that the household will have adequate income in subsequent months to afford housing.

- D. Verification of housing (or eviction notice for Stable Families program): Appropriate documentation, in the form of a signed lease, letter of approval, or intent to lease from the property owner or manager. The document <u>must</u> be signed and dated within the past 30 days and include the following information:
  - a) Tenant/client name (and significant other, when applicable);
  - b) Unit Address;
  - c) Name, address and telephone number of the property owner or manager;
  - d) Rent and security deposit amounts (full month and any prorated rent amount if applicable);
  - e) Signed lease (required for Direct Housing DCA applications. The minimum acceptable lease term is 6 months. Month-to-month leases are not acceptable because they do not indicate housing stability); and
  - f) Utilities the client is responsible for and cost estimate of utilities

In situations where a client will be living in a room of the landlord's home, a copy of a signed written agreement (e.g., lease) between the client and landlord should be provided, along with a phone number where such information can be verified.

The case manager will also document on the DCA application how the client is committed to maintaining their housing affordability and stability.

E. Verification of landlord property ownership and W-9: Property ownership is verified via the Franklin County Auditor's Website, http://franklincountyoh.metacama.com/altIndex.jsp.

If the property owner listed on the Auditor's website is different from the Vendor on the Check Request form a Property Management Agreement <u>must</u> be submitted between the Vendor and the property owner listed on the Auditor's website; <u>and</u> the W-9 for the Vendor must be completed, signed, and contain the social security number (if the Vendor is an individual) or the EIN (if the Vendor is a corporation/company).

If the property owner listed on the Auditor's website matches the Vendor on the Check Request form, the W-9 must be completed, signed, and contain the social security number (for an individual) or the EIN (of the corporation/company) of the owner/Vendor.

Note: If CSB has a W-9 on file dated in the past 12 months, as indicated on the CSB Vendor list, a W-9 will not be necessary.

Please note that ownership of property is verified through the Franklin County Auditor's website or by emailing or calling the Auditor's office. If ownership information is different than what is submitted with the DCA application, the application will be returned to the service provider until appropriate documentation is submitted to prove ownership and/or management representation. Property managers will need to provide a copy of their property management agreement with the owner of a property or other acceptable court

documentation (e.g., receivership papers). In some instances, land contracts will need to be provided.

## Property Management Agreements

Prior to submission, please read the terms of the agreement carefully and ensure all of the following are contained within the agreement:

- a. The property(ies) to be managed by the agent.
- b. Signature of both property owner and agent.
- c. Term of the Agreement
  - If the initial term of the agreement has expired (e.g., after one year from the agreement date) and there is an automatic renewal clause in the agreement (e.g., this agreement will automatically renew unless cancelled by either party within 30 days....), a letter from the property owner (not the agent) must accompany the agreement. The letter should indicate the agreement dated between Property Owner and Agent is still in effect and must be signed and dated by the Property Owner.
    - PLEASE NOTE: CSB will <u>not</u> accept initials of the property owner and/or agent on the letter or if dates are changed on the Property Management Agreement.

CSB is requiring this additional documentation to 1) protect the client from being denied housing due to the Property Management Agreement no longer being in effect; 2) prevent checks being written to the Agent when the Agreement is no longer in effect; and 3) avoid a potential lawsuit by the property owner.

Many landlords may not wish to provide their Employer Identification Number (EIN) or Social Security Number to the client or caseworker. The landlord may fax a completed and signed W-9 directly to the DCA Program Manager at (614) 221-9199. In addition, if privacy concerns still hinder the landlord from submitting a W-9, case managers may refer the landlord to the DCA Program Manager who will explain the CSB process and IRS requirement, and advocate for the client. If the landlord still refuses to complete a W-9, CSB is prohibited from providing financial assistance to that vendor on behalf of the client.

Landlord/Vendor List. CSB will maintain a DCA Landlord/Vendor List. The list will be distributed quarterly to DCA partner agency supervisors and case managers via email. CSB will require a new updated W-9 from landlord/vendors every 12 months. Landlords that will require an updated W-9 will be highlighted on the quarterly list, and will require an updated W-9 with submission of the DCA application.

- F. Verification of utility cost (if applicable). (*Provide a copy of documentation to CSB*)

  Acceptable documentation for utility deposit or arrears is a current itemized printout from the utility company that includes the following:
  - a) Utility company name
  - b) Amount owed
  - c) Tenant's/client's name (significant other's name)
  - d) Utility account number
  - e) Printout date

f) Type of request (e.g., deposit, arrear per period)

Monthly housing costs (rent and utilities) should not exceed 50% of household income for families with children and 40% of household income for individuals. Exceptions will occasionally be made for single adults or families with housing costs that exceed 40% or 50%, respectively, if the costs are not excessive. The Case Manager *must* explain the client's the ability to pay ongoing costs on the Calculations Sheet when housing costs exceed 40% or 50% for single adults and families, respectively, or the application will be considered incomplete and will delay processing of the application.

RRH/Navigator clients: Monthly rent cannot exceed fair market rent and must be reasonable in comparison to at least two other comparable units in the area. Fair Market Rent and comparisons are to be based on the appropriate unit size for the household.

#### Calculations Sheet

Monthly housing costs are determined by adding rent and the average actual/estimated monthly utility costs the client is responsible to pay. Average monthly utility amounts should be based on information obtained from utility companies whenever possible. Arrearages owed by the client carried forward by the utility company are added to the monthly housing costs calculation.

- G. DCA Program assistance will be used to assist participants with obtaining and maintaining the most appropriate housing. (Maintained in agency case file.)

  Designated staff should work with participants to promote self-determination with respect to housing choice, while also helping to make sure choices support long-term housing stability.
- H. Proof of leveraging other resources to the extent they are available and do not significantly delay housing stability or placement. (Maintained in agency case file.) Staff should assist clients in first leveraging other resources whenever possible. Sources include PRC, FEMA, HEAP, and on-going housing subsidy programs. DCA Program financial assistance may be used when leveraged resources are not available or will significantly delay housing placement. Case managers must document the date and type other resources on the DCA application.

### Client Signature Form

If a significant other is part of the household and contributing to the stability of the housing, or a DCA utility assistance request is being applied for in the significant other's name, his/her signature is also required on the DCA Client Signature Form.

#### **Assets**

An asset is cash or items that could be converted to cash quickly and includes the real or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant. Assets include:

a. Amounts in checking and saving bank accounts.

- Stocks, bonds, savings certificates, money market funds, and other investment accounts.
- c. The cash value of trusts that may be withdrawn by the household.
- d. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
- e. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

## Treatment of Assets as part of income verification

Evidence of a lack of financial resources and support networks is required through case manager assessment that other options are not available to applicant. This should be verified through comprehensive interview with regards to the following criteria:

- No family or friends can provide sufficient financial assistance to obtain housing or remain in housing.
- Amount in checking and savings bank accounts is less than \$500.
- Assets in excess of the amounts above will need to be utilized as part of the housing plan.

#### Payment of Rent and Utilities

Only designated staff that has been appropriately trained may recommend for payment to the CSB administered Direct Client Assistance programs (see E and G above) the amount of funds essential to get a participant into housing or to maintain housing before income is sufficient to afford total monthly rental costs.

Clients are not required to pay any amount towards their rent or utility costs while receiving direct client assistance. When financially able, eligible program participants may share in the costs of rent, utilities, security and utility deposits, moving, and other expenses. All assistance should be "needs-based," meaning that the amount of assistance is based on the minimum amount needed to prevent the program participant from returning to homelessness in the near term.

### Allowable & Non-Allowable DCA Costs by Program

# Stable Families Program

Allowable: housing application fees, rent, security deposit, and past utility debt obstructing housing placement; in some instances, limited assistance may be available in paying off past rental debt in order to obtain housing. It can be arranged with proper documentation from both the past and future landlord indicating non-payment would result in the loss of housing.

Non-Allowable: moving expenses, clothing, credit card debt, telephone bills, long distance bills, out of town travel expenses, client transportation costs, birth certificates, I.D., damage charges from previous apartments, shelter fees, washer and dryer, etc.

### **Transition Program**

Allowable: housing application fees, rent, security deposit, and past utility debt obstructing housing placement; in some instances, limited assistance may be available in paying off

past rental debt in order to obtain housing. It can be arranged with proper documentation from both the past and future landlord.

Non-Allowable: moving expenses, clothing, credit card debt, telephone bills, long distance bills, out of town travel expenses, client transportation costs, birth certificates, I.D., damage charges from previous apartments, shelter fees, washer and dryer, etc.

## RRH/Navigator Program

Allowable: rent, utilities (gas, electric, and water), moving expenses (such as U-Haul or moving service if necessary), application fees, security deposits, back utility bills. In some instances, limited assistance in paying off past rental debt in order to obtain housing can be arranged with proper documentation from both the past and future landlord.

Non-Allowable: clothes, credit card debt, telephone bills, long distance bills, out of town travel expenses, client transportation costs, washer and dryer, damage charges from previous apartments, shelter fees, and Furniture Bank of Central Ohio appointment fees. Local, public and private, state and federal ESG funds are used to fund the DCA program.

## **Rental Assistance**

If ESG or CoC funds are being utilized, Rental Assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types being provided through another federal, state, or local housing subsidy program.

- The rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness", if ESG or CoC funds are utilized.
- "Rent reasonableness" means that the total rent charged for a unit must be reasonable in relation to other rents being charged during the same time period for comparable units in the private unassisted market.
- In addition rents must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units.
- Lastly to be determined reasonable, the rent should not exceed the fair market rent (FMR) amount as determined by HUD.

Due to ESG and CoC rules and regulations, CSB will not pay any financial assistance in the form of rent using ESG, CoC, or match funds unless a leasing agreement has been established between CSB and the landlord of the applicant. Attached to this document is the rental assistance agreement (Attachment 12).

Clients may still receive rental assistance from programs that use other (non-ESG) sources, provided that the total assistance does not exceed the total of a security deposit (if necessary) and 1 month of rent for the DCA – Transition program.

#### Other Assistance

Utility assistance may only be paid for current charges accrued within thirty days of the request for assistance. Utility arrearages may only be paid for the lesser of up to three months for charges accrued within the last 6 months or \$1,000 worth of arrearages. Utility arrearages paid must be necessary in order to keep the utility operational within the unit unless otherwise approved by CSB. Clients are ineligible to receive assistance, if they are receiving the same assistance through other public sources.

## Housing Inspections for Programs Utilizing ESG or CoC Assistance

When a household (single adult or family) moves into a unit utilizing ESG or CoC assistance with a lease in their name, a housing inspection must be completed and must pass in order to receive financial assistance. The housing inspection must include a lead-based paint visual assessment. The inspection must be documented using the CSB Housing Inspection Form (attachment 25).

Initial inspections will be conducted for housing units into which a program participant will be moving. Each program will be expected to coordinate with the Housing Inspector and landlord to ensure inspections are completed.

If a household is utilizing non-ESG or non-CoC assistance to move into a unit, the case manager will examine the unit with the Head of Household. At that time the Head of Household must complete and sign the Housing Checklist. Completed Housing Checklists should be maintained in the client record files.

#### Supportive Services

Clients must be willing to partner with the provider agency in obtaining housing, stabilizing housing, and applying for financial assistance. Clients are expected to take an active role in obtaining required documentation and in locating and/or stabilizing suitable housing. Participation in the DCA Program begins at the point of intake and approval by CSB for financial assistance, and ends upon obtaining/stabilizing permanent housing.

Participants in the DCA Program are to be provided a level of supportive services appropriate so as to ensure the client's success in stabilizing or transitioning to stable housing.

Providers are required to promote and explain DCA program services, screen applicants for eligibility, and provide supportive services for participants, including basic assessment, case management, information and referral for housing and needed services, advocacy, and follow-up assistance as needed once housing is maintained or secured. The level of supportive services to be provided is determined on a case-by-case basis and is dependent on the availability of financial resources to fund these supportive services.

Providers are responsible for obtaining proper releases, obtaining eligibility documentation, facilitating credit and background checks, providing assistance in determining appropriate housing referrals, leveraging other resources when available, maintaining complete and accurate client files, and protecting client rights. Providers are expected to advocate for their clients with landlords, employers, debtors, community resources, and CSB.

#### Denial of Service and Appeal Due Process

Upon submission of applications, CSB will review for completeness, accuracy and adherence to program policies and procedures, including eligibility and the appropriateness of the financial request. If documentation is incomplete or if eligibility is not evident, CSB will notify the agency provider, who in turn will be responsible for correcting the application or denying service. If the financial request does not meet the program guidelines, or if the amount awarded is less than the request, CSB will notify the provider agency within 48-hours of application review. Clients who do not meet the eligibility criteria and are denied service must be informed immediately by designated staff, provided an explanation of the reason(s)

for denial, and explained how to appeal the denial of service per the provider agency's due process policies and procedures.

A completed *Funding/Assistance Denial* form must be completed, signed by two partner agency staff, and hand-delivered to the client with a copy placed in the client's file at the agency. The Community Shelter Board requires that all service denials be reviewed and approved by agency supervisory staff prior to client notification.

If a DCA application is denied the case manager has the right to appeal the decision with the DCA Program Manager and Program Manager. When appearing for an appeal the case manager must show sufficient evidence supporting the request to overturn the denial. The appeal must be conducted within 48 hours of the original denial. The decision of the appeal is final.

# Columbus Service Point (CSP) Data Entry

CSP participating agencies are responsible for CSP data entry, per established guidelines. Instructions for entering data have been provided to each agency CSP administrator. CSB will enter the final approved amount of financial assistance for each participant. A CSP referral to the designated CSB DCA program and an entry date in the Entry/Exit Record is due at the time the application packet is submitted. Applications lacking a CSP referral and/or entry date will not be processed until a referral or entry date is completed.

The CSB DCA Program Manager will enter CSP data for non-funded partner agencies without CSP access (e.g., CHOICES, Capital Crossroads). Caseworkers of these agencies must provide complete and accurate CSP required data with the DCA Program Application package, and a signed, current CSB Client Acknowledgement for Data Collection form.

#### Evaluation

Program Effectiveness: CSB shall evaluate the effectiveness of the program, including implementation of policies and procedures, at least annually as part of CSB's annual program evaluation. Recommendations for improvements will be shared with participating providers. Evaluation will also occur during periodic meetings with providers. Proper screening of clients, coupled with effective case management (including referrals to other community resources as needed) and follow-up should lead to a high degree of successful housing outcomes for program participants. Each provider agency submitting applications on behalf of program participants is expected to achieve the performance outcomes developed for the DCA Program. Specifically, 98% of program participants receiving Transition Program assistance shall obtain permanent housing with 95% continuing to maintain the permanent housing obtained with such funds for 90 days or more after exiting the shelter. (Clients being served by the RRH/Navigator program or the Stable Families program have alternative outcomes which must be met. Those outcomes are reflected on the agencies' respective Program Outcomes Plan.

Should an agency experience a higher than 5% recidivism rate, limited technical assistance may be offered to the agency to assist in correcting deficiencies. Provider agencies submitting applications shall have less than 5% of requests delayed or denied by CSB due to insufficient, inaccurate, or incomplete data. Program participation may be terminated if the agency consistently fails to achieve program performance expectations.

Program Audits & Reviews: Although extensive documentation must be submitted with each program application, it may also be necessary for CSB to conduct a program audit. CSP will be used to determine if providers are assuring retention in housing.

Needs of At-Risk and Homeless Individuals and Families: The needs of at-risk and homeless individuals and families, including those served by this program, are assessed annually by CSB, and include a review of program service denials and grievances actions. The information gathered from this assessment will help determine program direction, quality improvements, and other modifications.

**Application and Payment Process** 

# Application Timetable and Submission

Applications will be accepted throughout the year from referring agencies. CSB reserves the right to close the application process and not accept applications due to funding constraints or other compelling reasons. The CSB DCA Program Manager will publish and distribute an application processing schedule at least annually. The timetable below shall be followed each week, except as otherwise noted through an altered check schedule:

Step	Process	Deadline
1	Completed Applications Due	1:00 p.m. Monday
2	Application Review and Notification of	No later than 5:00 p.m. Monday
	Incomplete Applications	
Resubmission of incomplete, inaccurate, or		1:00 p.m. (noon) Tuesday of the
submission missing documentation for DCAs that		same week
have p	reviously been reviewed.	
3	Final Approval/Denials	10:00 a.m. Friday
4	Check Available for Mail	1:00 p.m. Friday
5	Check Available for Pick-up	1:00 p.m. Friday

Applications must be reviewed, approved, and signed by the authorized supervisor at the provider agency prior to submission. Only completed applications with all verification documentation may be submitted to CSB for processing. By submitting an application, partner agencies confirm that the information provided by both the client and the designated staff is both accurate and true.

Applications may be submitted at any time during CSB business hours or may be left in CSB's drop-box after business hours. However, only applications received by Monday (or other designated date) at 1:00 p.m. may be processed the current week if all required documentation is submitted with the application

### **Application Contents**

Applications must be submitted in the format provided by CSB. All applications for DCA Program financial assistance must be completed by the partner agency designated staff and include the following documentation:

- Direct Client Assistance Check Request
- Justification Sheet
- Income Calculations Form
- Household Budget Form
- Verification of Housing (including a completed W-9 and/or property management agreement, when needed)
- Verification of Income Documentation
- Legible copy of the client's ID
- CSP referral (agencies with CSP access)
- Other eligibility verification documentation as needed (e.g., utility documentation, imminent risk of homelessness documentation for Stable Families programs)
- CSP Data Form (Agencies without CSP access only)
- Client Acknowledgement for Data Collection (Agencies without CSP access only)

## RRH/Navigator

In addition to the documents above, the following are required for all RRH/Navigator DCA applications.

- Rental Assistance Agreement
- Staff Certification of Eligibility
- Funding Assistance Determination form
- Signed lease: The minimum acceptable lease term is 6 months. Month-to-month leases are not acceptable because they do not indicate housing stability.
- Completed inspection documented using CSB's Housing Inspection Form (including a lead-based paint visual assessment) and Rent Reasonableness form (to be completed by the partner agency or CSB's housing inspector)

Payment by the following providers - Salvation Army, Volunteers of America of Greater Ohio Family, Homeless Families Foundation Family, Communities in Schools and YWCA Family Center, and the Van Buren Family Shelter - to vendors, with subsequent reimbursement by CSB, should be extremely rare and can only be reimbursed by submitting a request for reimbursement and a copy of the agency check. Prior written approval needs to be obtained from the CSB DCA Program Manager before spending funds with the expectation of reimbursement. Prior to requesting reimbursement the Case Manager, or approved agency designee, must explore the option of the landlord excepting a Letter of Guaranty. Reimbursement requests require all the same forms of documentation necessary for a typical financial request, in addition to a copy of the check. A complete and accurate reimbursement request must be submitted for payment within 3 weeks (21 days) from the date on the check. Incomplete requests will not be processed for reimbursement.

### Application Review, Correction and Approval or Denial

Providers are required to have internal quality assurance procedures in place to minimize the possibility of incomplete, inaccurate, or fraudulent applications being submitted to CSB.

The CSB DCA Program Manager will review all applications. CSB will not approve or accept incomplete or inaccurate applications for payment, applications where eligibility is not

clearly identified and verified. The DCA Program Manager will notify the designated provider staff when a deficient or ineligible application is submitted to CSB. The DCA Program Manager will identify additional information or documentation needed to continue processing an application. The designated provider will have 15 business days from the original date of notification to submit all necessary paperwork. After 15 business days the incomplete application will be voided and destroyed. The application process will then have to start over with updated and complete information. Leases must be received within 5 business days from the date of the Letter of Guaranty, if one was issued. Referrals in CSP will expire 15 business days after initial submission to CSB.

*Under no circumstances should providers make promises* for the approval of an application for financial assistance with a landlord or other vendor.

Evidence of fraud may result in immediate suspension or termination from the program for the designated staff and/or the agency involved. Legal action may be sought against persons submitting fraudulent information to recoup costs in cases where payment has been issued by CSB.

Funded partner agencies will be withheld from the DCA participation until full payment is reimbursed to CSB. For non-funded providers, further participation in the DCA program will be suspended until CSB repaid in full. CSB reserves the right to take legal action to recoup costs.

## **Check Disbursement**

Checks will only be made payable to a verified vendor (e.g., landlord, utility company) from whom services or housing are being provided. Under no circumstances will checks be made payable or released to clients. Checks will be mailed from CSB directly to the vendor on Friday each week at the latest, except where otherwise noted on the published schedule. The Program Manager-Direct Client Assistance will notify the agency representative by email of final actions taken on the applications not later than Friday each week.

Only authorized employees of provider agencies are permitted to pick up checks. Neither clients nor vendors are permitted to pick up checks. Provider agencies must provide CSB with a list of employees authorized to pick up checks and such employees must be able and willing to provide picture identification, if requested, before receiving checks.

Checks may be picked up and delivered to the landlord only after confirmation between the agency staff member and the Program Manager-Direct Client Assistance that mailing the check from CSB will result in a loss of housing or significant delay in moving from a shelter. Agency staff delivering checks should obtain a receipt from the vendor and keep it in the client's record. If a check picked up by an agency representative is not delivered to the appropriate vendor, the agency is responsible for any ensuing administrative charges up to \$35.00 and may also be held responsible for the amount of the check itself. Staff that does not deliver a check to the appropriate vendor may have their ability to submit DCA Program applications suspended.

Every effort is made by CSB to mail the check to the appropriate landlord/vendor by Friday of each week, except as otherwise noted on the application processing schedule. If a client

is at imminent risk of eviction or would be able to move from shelter into housing quicker, a Letter of Guaranty may be requested from CSB. The caseworker may request a Letter of Guaranty on the Check Request Form. The case manager <u>must</u> provide the following information on the Check Request Form:

- The name of the person who should receive the Letter of Guaranty fax/email; and
- The recipients email address

Once the application has been received, reviewed, verified, all follow-up information has been received (if applicable) and approved; the Letter of Guaranty will be emailed to the designated person and case manager upon approval.

## **Transitional Housing**

# Overview/Purpose

Transitional housing is designed to provide housing and appropriate supportive services to homeless persons to facilitate movement to independent living within a maximum stay of 24 months. Transitional housing is funded through federal, HUD Continuum of Care funds. The eligibility criteria as defined by each provider agency are as follows:

## Eligibility Criteria

# YMCA Housing Stabilization Program

- Eligibility
  - A consumer from an Ohio Behavioral Healthcare Organization is submitted to ADAMH Board for approval for the YMCA Housing Stabilization Program. The program screens clients that are clinically ready for discharge from any Ohio Behavioral Health Organization, but whose psychiatric hospitalizations are being extended due to homeless status for the following eligibility criteria:
    - No sexual offense or predator conviction/requirement to register;
    - No arson related offense conviction; and
    - Must meet all other YMCA housing requirements detailed in the YMCA's Criminal Convictions Policy.
  - o The program has an average length of participation of four (4) months.
- Prioritization
  - Due to low-income housing tax credit rules, the YMCA Housing Stabilization Program cannot set aside or reserve rooms.
- Waitlist Management
  - o Each unit is available on a first come, first serve basis.

### Huckleberry House Transitional Living Program

- Eligibility
  - The Transitional Living Program screens clients for the following eligibility criteria:
    - Youth is able to remain in community (with support) without being a danger to themselves or community;
    - Youth meets HUD criteria for homelessness (24 CFR 576.2);

- Youth is displaying emotional/behavioral disturbance;
- Youth is within ages of 16 to 21; and
- Youth is willing to schedule for counseling services.
- The program has an average length of participation of ten (10) months.

### Prioritization

- All clients who meet admission/eligibility criteria will begin counseling to secure a slot on the Housing Wait List.
- Waitlist Management
  - Each unit is available on a first come, first serve basis.

# Maryhaven Women's Transitional Program

- Eligibility
  - Maryhaven's Women's Transitional Program assists women and children interested in rebuilding their lives from homelessness, addiction and mental illness. The program screens clients for the following eligibility criteria:
    - Referral must be a single female at least 19 years of age with or without children;
    - Referral must be a single female whose life has been affected by homelessness, addiction and/or mental illness;
    - Referrals must meet U.S. Department of Housing and Urban Development (HUD) definition of homelessness (24 CFR 576.2);
    - Referrals must have identification (birth certificate(s), social security cards and/or picture identification;
    - Referrals must have referral information from a local community agency or hospital; and
    - Referral must have verification of mental health diagnosis (where applicable).
  - The program has an average length of participation of four (4) months.
- Prioritization
  - Pregnant women and women with children are given admission priority.
- Waitlist Management
  - Maryhaven Women's Transitional Program does not operate a wait list.

### Southeast Inc., New Horizons Transitional Housing Program

- Eligibility
  - The New Horizons Case Manager receives referrals from community partners and homeless service providers. The New Horizons Case Manager will discuss the program with potential tenants and assess their appropriateness for the program in an Eligibility Determination Interview. The program screens clients for the following eligibility criteria:
    - There are four eligible institutions: TVBH, Netcare Miles House, Netcare CSU, and OSU/Harding.
    - Individuals must be verified as literally homeless on the day of their admission to TVBH, Miles House, CSU, and OSU/Harding <u>and</u> need to meet the HUD definition of homelessness on the day of

- discharge from the same institution literally on the streets with no other safe place to go.
- Institution stays at the four named institutions must be less than 90 days.
- Verification of homelessness on the day the individual is admitted to the named institution may <u>only</u> be verified by CSP printout.
- While there is no length of time homeless requirement for individuals referred to the New Horizons program, those with the longest length of homeless time should be prioritized.
- The program has an average length of participation of four (4) months.

#### Prioritization

 If an applicant is eligible for the New Horizons Transitional Housing program but there is no space available in the program at the time of application, the applicant will be placed on a waiting list and staff will make an effort to refer the applicant to an alternate system of care that may meet their individual needs.

## Waitlist Management

- When program space becomes available, individuals from the waiting list will be contacted first prior to consideration of new applicants.
- Wait-listed applicants will be made aware of program openings.
- Staff will attempt to contact the wait-listed applicant based on the length of time spent on the wait list over the course of three business days.
- o If the applicant does not respond by the close of business on the third day, program staff will move forward with contacting the next individual on the waiting list and that individual applicant will need to complete a new application if they wish to be considered for program admittance.

### Eligible Activities

See section 9 – CoC Eligible Activities for more information.

### Recordkeeping

See section 9 - CoC Eligible Activities for more information.

## **Termination**

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

In accordance with CSB PR&C Standard F7, to terminate rental assistance or housing relocation and stabilization services to a program participant in a RRH/Navigator program or a permanent housing or transitional housing program, the required formal process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the program participant is given the opportunity to
  present written or oral objections before a person other than the person (or a
  subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

CSP Site Administrators oversee the closing of CSP entries (Service Record, Entry/Exit Records)

For Permanent Supportive Housing and Transitional Housing, Case Managers will conduct exit interviews for each household exited, utilizing an exit survey. The exit survey must include client verification that any religious activities have been optional. Completed exit survey results are compiled to assist programs in determining any necessary changes.

## **Permanent Supportive Housing**

### Overview/Purpose

Permanent Supportive Housing

Permanent Supportive Housing in Columbus and Franklin County is funded using local public and private, state and federal HUD funding, through the annual Continuum of Care Application.

The Unified Supportive Housing System (USHS) is one way to access permanent supportive housing in Franklin County. USHS is a collaborative effort managed by The Alcohol, Drug, and Mental Health Board of Franklin County (ADAMH), The Columbus Metropolitan Housing Authority (CMHA) and the Community Shelter Board (CSB). These partners are working together with other agencies in the community including behavioral health, housing, shelter, and outreach providers. A major goal of the system is to coordinate efforts to place the most vulnerable of the community's population into housing.

### Eligibility Criteria

Permanent Supportive Housing Eligibility Criteria

All programs serving Rebuilding Lives or Chronically Homeless populations must follow the Rebuilding Lives and/or Chronic Homeless guidelines (Attachment 2). Eligibility criteria are monitored in accordance with CSB PR&C Standards E2, E3 and E4. All Permanent Supportive Housing programs must prioritize services in accordance with Notice CPD-14-012, the HUD Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status, and CSB PR&C Standard H1.

### USHS Eligibility Criteria

The USHS serves households of one or more persons (depending on the project and unit sizes), at least one of whom is a person with a disability. Disabled persons may also be homeless or individuals exiting institutional settings (hospitals, jails, prisons, nursing homes). All persons considered for placement in USHS units must meet the eligibility criteria

and prioritization as described in the USHS Policies and Procedures document attached hereto as Attachment 10.

# **Eligible Activities**

See section 9 – CoC Eligible Activities for more information.

## Recordkeeping

See section 9 – CoC Eligible Activities for more information.

### Termination

If a program participant violates program requirements, the provider may terminate the assistance in accordance with a formal process established by the provider that recognizes the rights of individuals affected. The provider must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. The termination process must be followed in accordance with CSB PR&C Standards E7, F6 and F7.

In accordance with CSB PR&C Standard F7, to terminate rental assistance or housing relocation and stabilization services to a program participant in a <u>direct housing or RRH program or a permanent housing or transitional housing program</u>, the required formal process, at a minimum, must consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination;
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

CSP Site Administrators oversee the closing of CSP entries (Service Record, Entry/Exit Records).

For Permanent Supportive Housing and Transitional Housing, Case Managers will conduct exit interviews for each household exited, utilizing an exit survey. The exit survey must include client verification that any religious activities have been optional. Completed exit survey results are compiled to assist programs in determining any necessary changes.

Agencies providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that a program participant's assistance is terminated only in the most severe cases (24 CFR 578.91(c)). Termination under this section does not bar the provider from providing further assistance at a later date to the same family or individual.

## CoC Eligible Activities including Transitional Housing and Permanent Supportive Housing

## Continuum of Care Project Administrative Costs

All programs receiving funds from HUD for administrative costs are subject to 24 CFR 578.59. Project administrative costs include:

- 1. General management, oversight and coordination:
  - a. Salaries, wages and related costs:
    - i. Preparing program budgets, schedules and amendments;
    - ii. Developing systems for assuring program compliance;
    - iii. Developing agreements with sub-recipients and contractors;
    - iv. Monitoring program activities for progress and compliance;
    - v. Preparing reports and other documents related to the program for submission to HUD;
    - vi. Coordinating the resolution of audit and monitoring findings;
    - vii. Evaluating program results;
    - viii. Managing and supervising the above activities.
  - b. Travel costs for monitoring sub-recipients;
  - c. Administrative services performed by third-party contracts (i.e. general legal services, audits, accounting services);
  - d. Other costs related to the administration of the program (i.e. equipment, insurance, utilities, office supplies, office space, etc.).
- 2. Training on CoC requirements including costs of providing training and attending HUD sponsored trainings;
- 3. Environmental review.

#### Leasing

- Leasing means that the lease is between the recipient of funds and the landlord.
- Funds may be used to pay for 100 percent of the costs of leasing a structure or structures, or portions thereof, to provide housing or supportive services to homeless persons for up to 3 years.
- Leasing funds may not be used to lease units or structures owned by the recipient, subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership, where the partnership owns the structure, unless HUD authorized an exception for good cause.
- The rent paid must be reasonable in relation to rents being charged in the area for comparable space. In addition, the rent paid may not exceed rents currently being charged by the same owner for comparable unassisted space taking into account the location, size, type, quality, amenities, facilities, and management services. The rent paid may not exceed HUD-determined fair market rents.
- If electricity, gas, and water are included in the rent, these utilities may be paid from leasing funds. If utilities are not provided by the landlord, these utility costs are an operating cost.
- Funds may be used to pay security deposits, in an amount not to exceed 2 months of actual rent. An advance payment of the last month's rent may be provided to the landlord in addition to the security deposit and payment of the first month's rent.
- Occupancy agreements and subleases are required as specified in HUD § 578.77(a).

- Housing funded with CoC Leasing funds must pass an inspection, including a leadbased paint visual assessment. The inspection must be documented using the CSB Housing Inspection Form (attachment 25).
- Residents may pay rent. The rent will not exceed 30% of the family's monthly adjusted income. The resident's income must be reviewed annually and rent contributions adjusted accordingly.
- Leasing payments will go directly to a landlord, not to program residents.
- Rents collected from program participants are considered program income.
- Leasing funds do not require a match.

#### Rental assistance

- Funds may be used for rental assistance for homeless individuals and families.
   Rental assistance cannot be provided to a program participant receiving rental assistance or operating assistance through other federal, State, or local sources.
- Funds may be used for security deposits in an amount not to exceed 2 months of rent. An advance payment of the last month's rent may be provided to the landlord, in addition to the security deposit and payment of first month's rent.
- Funds may be used in an amount not to exceed one month's rent to pay for any damage to housing due to the action of a program participant. This shall be a one-time cost per participant, incurred at the time a participant exits a housing unit.
- Program participants in PSH housing must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party.
- Program participants in Transitional Housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months.
- The rental assistance may be:
  - tenant-based (program participants choose housing of an appropriate size in which to reside)
  - project-based (provided through a contract with the owner of an existing structure, where the owner agrees to lease the subsidized units to program participants; program participants will not retain rental assistance if they move)
  - sponsor-based (provided through contracts between the recipient and sponsor organization; program participants must reside in housing owned or leased by the sponsor)
- Rental assistance must be administered by the local public housing authority, CMHA.
   Housing funded with CoC Rental Assistance funds must pass an inspection, including a lead-based paint visual assessment.
- Rental assistance payments will go directly to a landlord, not to program residents.
- Rent assistance will be provided for a unit only if the rent is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged by the same owner for comparable unassisted units and must not exceed the FMR.

- Each unit receiving rental assistance must be inspected annually by CMHA.
- If a unit is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person. Brief periods of stays in institutions, not to exceed 90 days for each occurrence, are not considered vacancies.
- Residents must pay rent. The rent will not exceed 30% of the family's monthly adjusted income. The resident's income must be reviewed annually and rent contributions adjusted accordingly.
- Rents collected from program participants are considered program income.

### Supportive Services

The supportive services component is limited to providing services to individuals and families in housing operated by the provider. Providers may use the funds to conduct outreach to sheltered and unsheltered homeless persons, link clients with housing or other necessary services, and provide ongoing support.

If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Supportive services must be necessary to assist program participants obtain and maintain housing. Each program must conduct an annual assessment of the service needs of the program participant and should adjust services accordingly (Attachment 22).

Services must be offered to residents of Permanent Supportive Housing and Transitional Housing for the full period of their residence. RRH Programs must require program participants to meet with a case manager at least monthly. Services may be provided to formerly homeless individuals for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project (24 CFR 578.53).

## Eligible Costs

All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

- Annual Assessment of Service Needs: The costs of the assessment required by 24 CFR 578.53 (a) (2) are eligible.
- Assistance with moving costs: Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.
- Case management: The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:
  - Developing an individualized housing and service plan, including planning a path to permanent housing stability;
  - Counseling;
  - Developing, securing, and coordinating services;

- Using the centralized or coordinated assessment system as required under 24 CFR 578.23 (c) (9).
- Obtaining federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers; and
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking.
- Child care: The costs of establishing and operating child care, and providing childcare vouchers, for children from families experiencing homelessness, including the provision of meals, snacks, and comprehensive and coordinated developmental activities, are eligible.
  - o The children must be under the age of 13, unless they are disabled children.
  - Disabled children must be under the age of 18.
  - The child-care center must be licensed by the jurisdiction in which it operated in order for its costs to be eligible.
- Education services: The costs of improving knowledge and basic educational skills are eligible.
  - Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
  - Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
- Employment assistance and job training: The costs of establishing and operating
  employment assistance and job training programs are eligible, including classroom,
  online and/or computer instruction, on-the-job instruction, services that assist
  individuals in securing employment, acquiring learning skills, and/or increasing
  earning potential. The cost of providing reasonable stipends to program participants
  in employment assistance and job training programs is also an eligible cost.
  - Learning skills include those skills that can be used to secure and retain a job including the acquisition of vocational licenses and/or certificates.
  - Services that assist individuals in securing employment consist of:
    - Employment screening, assessment, or testing;
    - Structured job skills and job-seeking skills;
    - Special training and tutoring, including literacy training and prevocational training;
    - Books and instructional material:
    - Counseling or job coaching; and
    - Referral to community resources.
- Food: The cost of providing meals or groceries to program participants is eligible.
- Housing search and counseling services: Costs of assisting eligible program
  participants to locate, obtain, and retain suitable housing are eligible.
  - Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.
  - Other eligible costs are:

- Mediation with property owners and landlords on behalf of eligible program participants;
- Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
- The payment of rental application fees.
- Legal services: Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.
  - Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protections and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.
  - Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
  - Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the sub recipient is a legal services provider and performs the services itself, the eligible costs are the sub recipient's employees' salaries and other costs necessary to perform the services.
  - Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.
- Life skills training: The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Types of component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.
- Mental health services: Eligible costs are the direct outpatient treatment of mental health conditions. Treatment must be provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- Outpatient health services: Eligible costs are the direct outpatient treatment of medical conditions (when provided by licensed medical professionals) including:
  - Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;
  - Assisting individuals to understand their health needs;
  - Providing direct medical treatment, or assisting individuals to obtain and utilize appropriate medical treatment;

- Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
- Provision of appropriate medication;
- Providing follow-up services; and
- Preventive and non-cosmetic dental care.
- Substance abuse treatment services: The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
- Transportation: The eligible costs for transportation are:
  - The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or sub recipient to and from medical care, employment, child care, or other services eligible under this section;
  - Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;
  - The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;
  - The costs of gas, insurance, taxes, and maintenance for the vehicle;
  - The costs of recipient or sub recipient staff to accompany or assist program participants to utilize public transportation; and,
  - If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
    - Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
    - Payments for car repairs or maintenance must be paid by the recipient or sub recipient directly to the third party that repairs or maintains the car; and
    - The recipients or sub recipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
- Utility deposits: This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to the utility company.
- Direct provision of services: If a service described above is being directly delivered by the recipient or sub recipient, eligible costs for those services also include:
  - The costs of labor or supplies, and materials incurred by the recipient or sub recipient in directly providing supportive services to program participants; and
  - The salary and benefit packages of the recipient and sub recipient staff who directly deliver the services.

#### Ineligible Costs

Any cost that is not described as an eligible cost above is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of

obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

## Operating costs

Grant funds may be used to pay the costs of the day-to-day operation of transitional and permanent housing in a single structure or individual housing units.

- Eligible costs
  - (1) The maintenance and repair of housing;
  - o (2) Property taxes and insurance;
  - (3) Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost);
  - (4) Building security for a structure where more than 50 percent of the units or area is paid for with grant funds;
  - o (5) Electricity, gas, and water;
  - o (6) Furniture; and
  - o (7) Equipment.

## Ineligible costs

O Program funds may not be used for rental assistance and operating costs in the same project. Program funds may not be used for the operating costs of emergency shelter- and supportive service-only facilities. Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease. Any cost that is not described as an eligible cost above is not an eligible operating cost to be paid with Continuum of Care program funds.

#### Match

Subrecipients must match all grant funds, except leasing funds, with at least 25 percent of funds or in-kind contributions. Both cash and in-kind match must only be used for the eligible activities outlined above. Any activity that is allowable under the above guidelines is also allowable under match.

• Cash match can come from any source, including other federal sources (except CoC program funds) and State, local, and private sources, as long as the funds are not statutorily prohibited to be used as match.

In-kind match includes the value of any property, equipment, goods, or services contributed to the project as match. Services provided by a third party must be documented by a Memorandum of Understanding (MOU).

#### Program Income

The subrecipient will retain program income – the income received by the subrecipient directly generated by a grant-supported activity – and will add the program income to the funds committed to the project.

- Program income must be used for CoC-eligible activities, as outlined above.
- Include income where the costs incurred to generate that income are CoC (or match) costs. Do not include income where the costs incurred to generate that income are unallowable or not part of the program.

- Rents/occupancy charges and laundry charges are program income. Revenue from renting space is program income if the space rented is in a CoC-funded facility.
- Section 8 revenue is not program income.
- Program Income cannot be used as Match.

# III. Information Applicable to All Programs

# 1. Homeless Management Information System

All programs receiving funding through CSB are required to maintain all client data in the Homeless Management Information System (Columbus Service Point). The goal of the Columbus ServicePoint is to support the delivery of homeless and housing services in Columbus and Franklin County. The CSP is:

- a benefit to individual clients through enhanced service delivery
- a tool for the provider agencies in managing programs and services
- a guide for CSB and its funders regarding community resource needs and service delivery

While accomplishing these goals, CSB recognizes the primacy of client needs in the design and management of the CSP. These needs include both the need to continually improve the quality of homeless and housing services with the goal of eliminating homelessness in Columbus and Franklin County, and the need to vigilantly maintain client confidentiality, treating the personal data of our most vulnerable populations with respect and care. As the guardians entrusted with this personal data, we have both a moral and a legal obligation to ensure that this data is being collected, accessed and used appropriately as specified in the Quality Assurance Tracking and Data Standards (Attachment 13). Data collected from and/or pertaining to clients is considered Protected Personal Information ("PPI") and managed in accordance with CSB PR&C M Standards, Privacy and Security Policy and CSP Policies and Procedures (Attachment 14 and 15). The needs of the people we serve are the driving forces behind the CSP.

## 2. Coordinated Point of Access/Homeless Hotline

Single Adult Shelter System and Family Shelter System

As part of the Single Adult Shelter system and Family Shelter System, CSB has implemented the Coordinated Point of Access (CPoA)/Homeless Hotline for all clients attempting to obtain shelter. CPoA/Homeless Hotline has specialists available 24 hours a day, 7 days a week to conduct a preliminary triage and assessment and to explore diversion possibilities via a prescribed set of diversion questions, in accordance with CSB PR&C Standard E11. Clients determined to meet shelter eligibility criteria are then referred to the most appropriate shelter bed. All shelters except Maryhaven Engagement Center are contractually obligated to coordinate services through the CPoA/Homeless Hotline. Once in shelter, each individual and family's need is assessed using the community's Vulnerability Assessment, in accordance with CSB PR&C Standard G7.

If the Call Specialist receives a call from someone in need of assistance due to domestic violence/dating violence, sexual assault and/or stalking, the call specialist assisting the caller can connect that caller to an appropriate intervention hotline. Such services in Franklin County include: CHOICES, the Ohio Hispanic Coalition, the Buckeye Region Anti-Violence Organization, Franklin County Prosecutor's Office Victim Witness Assistance, Sexual Assault Response Network of Central Ohio, Legal Aid Society of Columbus, Ohio Intimate Partner Violence Collaborative and City Attorney's Office: Domestic Violence/Stalking Unit.

The process for assessing and referring a person experiencing domestic violence, dating violence, sexual assault and/or stalking is as follows:

- Immediately write down the phone number that appears on the caller ID.
- Assess the situation to ensure the caller's safety and the safety of those accompanying them. If the caller is not safe or indicates that the abuser will return soon, advise them to hang up and dial 9-1-1. If the inquirer is in a safe place, continue with the procedure.
- Depending on the severity of the immediate situation:
  - Contact 9-1-1 on behalf of the caller, by requesting it of another Call Specialist or by using a different phone, but never disconnect from the initial caller;
  - Contact the appropriate intervention hotline based on the information in the Refer database without disconnecting from the initial caller; ensure that the eligibility and operation hours meet the current need;
  - o Give the phone number to the caller and have him/her call on his/her own;
  - Provide transportation assistance for the caller to access emergency shelter (as needed).
- If your assessment reveals that the caller is in immediate danger but he/she refuses to receive referrals from you or disconnects the call, notify the appropriate domestic violence intervention hotline and/or 9-1-1 immediately. Save the referral in Refer under the associated taxonomy term.

The Policies and Procedures governing the CPoA/Homeless Hotline are attached as Attachments 16 & 17.

### 3. Coordination with other targeted homeless services

Other homeless services	Coordination
Permanent Supportive Housing - Rental Assistance	<ul> <li>Participate in CSP</li> <li>Receive referrals from local emergency shelter and outreach providers</li> <li>Monitoring, performance oversight and quality improvement</li> <li>*USHS coordination</li> </ul>
<ul> <li>Permanent Supportive Housing</li> <li>Community Housing Network</li> <li>National Church Residences</li> <li>Columbus Area Integrated</li> </ul>	<ul> <li>Participate in CSP</li> <li>USHS coordination</li> <li>Monitoring, performance oversight and quality</li> </ul>

Health Services  • YMCA of Central Ohio  • YWCA Columbus Ohio  • Maryhaven  • VOAGO  Runaway and Homeless Youth  • Huckleberry House	<ul> <li>Participate in CSP</li> <li>Receive referrals from local emergency shelter and outreach providers</li> </ul>
<ul> <li>VASH Vouchers</li> <li>VOAGO Veterans Program (GPD)</li> <li>VOAGO Veteran Emergency Housing (VADOM)</li> <li>VOAGO Supportive Services for Veterans' Families (SSVF)</li> <li>LSS Veteran Emergency Housing (VADOM)</li> <li>LSS Supportive Services for Veterans' Families (SSVF)</li> </ul>	<ul> <li>Participate in CSP</li> <li>Receive referrals from local emergency shelter and outreach providers</li> <li>Monitoring, performance oversight and quality improvement</li> </ul>

## 4. Shelter and Housing Standards

All shelter and housing units funded through CSB must follow and comply with all the standards below. Compliance with these standards is monitored annually by CSB.

- (a) Lead-based paint remediation and disclosure. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all ESG- and CoC-funded housing occupied by program participants. Applicable PR&C standards J21.
- (b) <u>Minimum standards for emergency shelters.</u> Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation and privacy standards.
  - (1) <u>Structure and materials.</u> The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Applicable PR&C standards J1.
  - (2) Access. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C.

- 12131 et seq.) and 28 CFR part 35; where applicable. Applicable PR&C standards B5 and J1.
- (3) <u>Space and security.</u> The shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings. Applicable PR&C standards J4, J12 and J14.
- (4) <u>Interior air quality.</u> Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents. Applicable PR&C standards J9.
- (5) <u>Water supply.</u> The shelter's water supply must be free from contamination. Applicable PR&C standards J6.
- (6) <u>Sanitary facilities</u>. Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste. Applicable PR&C standards J6.
- (7) <u>Thermal environment.</u> The shelter must have any necessary heating/cooling facilities in proper operating condition. Applicable PR&C standards J9.
- (8) <u>Illumination and electricity.</u> The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter. Applicable PR&C standards J11.
- (9) <u>Food preparation</u>. Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner. Applicable PR&C standards J16.
- (10) <u>Sanitary conditions.</u> The shelter must be maintained in a sanitary condition. Applicable PR&C standards J10.
- (11) <u>Fire safety.</u> There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency. Applicable PR&C standards J18.
- (c) <u>Minimum standards for permanent housing.</u> Any permanent housing that receives assistance through ESG must also meet the following minimum safety, sanitation and habitability standards.
  - (1) <u>Structure and materials.</u> The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. Applicable PR&C standards J1.
  - (2) Space and security. Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep. Applicable PR&C standards J10.
  - (3) <u>Interior air quality.</u> Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents. Applicable PR&C standards J9.
  - (4) <u>Water supply.</u> The water supply must be free from contamination. Applicable PR&C standardsJ6.

- (5) <u>Sanitary facilities.</u> Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste. Applicable PR&C standards J6.
- (6) <u>Thermal environment.</u> The housing must have any necessary heating/cooling facilities in proper operating condition. Applicable PR&C standards J9.
- (7) <u>Illuminating and electricity.</u> The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure. Applicable PR&C standards J11.
- (8) Food preparation. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner. Applicable PR&C standards J16.
- (9) <u>Sanitary conditions.</u> The housing must be maintained in a sanitary condition. Applicable PR&C standards J10.
- (10) Fire safety. (i) There must be a second means of exiting the building in the event of fire or other emergency. Applicable PR&C standards J18.
   (ii) Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. Applicable PR&C standards J18.
- (iii) The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas. Applicable PR&C standards J18.

#### 5. Coordination of services

Finding appropriate housing is the first priority for Case Managers. Follow-up care, including linkages to community-based supportive services, to help the family maintain housing is the next priority after housing is obtained. The Case Manager's goal is to monitor the families' progress and to link families to ongoing community-based support systems and services, not to assume the role of primary support system.

The Case Manager will make referrals to appropriate community resources, benefits and other income supports. Community resources should be sought for assistance with employment opportunities, education, job skills classes, parenting classes, physical health care and mental health services, child care services, transportation services, alcohol and other drug treatment programs, material assistance programs, moving assistance, adult/children's protective services, and additional financial planning as needed.

As part of its annual contracting process with CSB, each agency must identify key supportive services provided by other agencies to clients in the program and the corresponding level of collaboration with each to be notated in the chart below. Collaboration between multisystems is a requirement to fully address the needs of clients within the homeless system.

Agencies/Programs	Brief description of program
Family and youth services provided by:	
Columbus Public Schools and other Franklin Co. Schools	Offers public education for children in k- 12 <sup>th</sup> grade. Project Connect with Columbus Public Schools offers advocacy, support and coordination of school-related services for children experiencing homelessness.
Franklin County Children Services	Children Services works to protect children and strengthen families through a wide range of services including kinship care, mentoring, case management, foster care and family preservation programs.
Juvenile Court and Youth Services	The Ohio Department of Youth Services (DYS) is the juvenile corrections system for the state of Ohio it confines felony offenders, ages 10 to 21, who have been adjudicated and committed by one of Ohio's 88 county juvenile courts. During their stay with DYS, youth are engaged in programming that is designed to address their criminological and behavioral needs. Each of the four DYS facilities also operates a year-round school that offers general curriculum as well as vocation opportunities.
Directions for Youth and Families	A non-profit organization that offers multiple programs and services in prevention, intervention and education for youth and their families.
Head Start	A non-profit organization that provides high quality, comprehensive development programs and services to income-eligible children and their families. Children ages 3-5 years old may attend full or part-day preschool classes that focus on developing school readiness skills, along with providing health, nutrition, and other social services throughout program enrollment.
Financial, food, clothing and/or household assistance provided by:	
Franklin County Veterans Services Commission	County agency dedicated to helping veterans, active duty members of the Armed Forces of the United States, and their minor dependents. Provides emergency financial assistance for rent, mortgage, utilities and food.

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Communities in Schools – Stable Families	A non-profit project of Communities In Schools of Central Ohio. The goal of the program is to decrease family homelessness in Franklin County. It is a short-term program assisting families with housing related issues. Participants in the program commit to case management and are typically provided with financial assistance to maintain their housing.
Compass	A faith based organization that provides limited financial assistance to prevent homelessness.
Gladden Community House	A non-profit community house that provides short-term financial assistance to families to prevent homelessness.
Dress For Success	A non-profit organization that provides interview suits, confidence boosts, and career development to low-income women.
NIOL	A faith based organization operating under the Catholic Charities of the Diocese of Columbus. Provides limited emergency assistance for rent, utilities, birth certificates, bus passes and food.
Lutheran Social Services (EFSP):	EFSP offers limited one time financial assistance for rent or mortgage. Program is administered by LSS, but offered through various community organizations.  Program usually begins in April and runs until funds have been depleted.
Furniture Bank of Central Ohio	Non-profit organization that provides free furniture and household items to people unable to furnish their own homes. Clients must be referred by a social service organization.
Salvation Army	Faith-based organization offering various emergency assistance programs. Programs may assist with utilities, rent, furniture, clothing and food.
Volunteers of America	A non-profit organization that provides food to more than 3,000 individuals and families in need through food pantries each year.
Mid-Ohio Food Bank	A non-profit organization that supplies food to more than 550 food pantries, soup kitchens, shelters, after school programs and senior housing sites in 20 counties in central and eastern Ohio.

Life Care Alliance	Offers nutritious lunches for older adults at various community sites.
Health care services provided by:	
Columbus Public Health	Local public health agency that provides clinical, environmental and health promotion services to Columbus and Worthington. Services include drug treatment, immunizations, dental care and free or reduce cost health clinics.
Columbus Neighborhood Health Centers	Non-profit organization that provides lost cost options for primary care to the community. Services include primary healthcare, dental, vision, nutrition planning and diabetes education.
AccessHealth Columbus	AccessHealth Columbus is a non-profit, public-private partnership working to improve access to health care by coordinating collaborative improvement projects in Central Ohio such as Patient-Centered Primary Care Collaborative of Central OhioHealth, Care Reform Collaborative of Central Ohio, Federally Qualified Health Center Collaborative of Central Ohio, and Legacy Improvement Projects.
Mount Carmel Hospitals	Healthcare system that includes hospitals, outpatient facilities, physicians' offices, surgery centers, urgent care centers, community outreach sites and homes throughout central Ohio.
Ohio State University Hospitals  Ohio Health Hospitals	Ohio State University Hospital specializes in critical care, organ transplantation, women's health, digestive diseases, minimally invasive surgery, rehabilitation and neurosciences.  Family of faith-based hospitals and
(Grant/Riverside/Doctors)	healthcare organizations serving patients in central Ohio.
Income supports and healthcare benefits provided by:	
Franklin County Department of Job and Family Services	Provides cash and income assistance programs including TANF, State Children's Health Insurance, Medicaid, SNAP, WIC and unemployment
U.S. Department of Veterans Affairs	Provides Healthcare and Compensation, Education Home Loans and Vocational Rehabilitation for qualified Veterans

Social Security Administration	Provides The Supplemental Security Income (SSI) program which pays benefits to disabled adults and children who have limited income and resources, as well as SSDI which provides benefits to disabled or blind persons who are "insured" by workers' contributions to the Social Security trust fund.
Healthcare for homeless veterans	HCHV programs serve as the hub for a myriad of housing and other services which provide VA a way to outreach and assist homeless Veterans by offering them entry to VA care.
Dental services for homeless veterans	Homeless Veterans Dental Program works to increase the accessibility of quality dental care to homeless Veteran patients and to help assure success in VAsponsored and VA partnership homeless rehabilitation programs throughout the United States.
Job readiness, training and placement	
services provided by:	A construction that are interest
COVA	A non-profit organization that provides a complete range of career development services, including: Career Development, Benefits Consultation, and Services for Employers
Franklin County Department of Job & Family Services	The Office of Workforce Development (OWD) offers a variety of direct and indirect services to people looking for jobs in Ohio; including WIA employment and training services targeting adults, dislocated workers, and youth who must be: Deficient in basic literacy skills, Homeless, School Dropout, Ex-Offender, Runaway, Foster Child, Pregnant or a Parent.
Goodwill Industries	A national non-profit agency with programs that range from specialized rehabilitation programs to career services and commercial operations; including job readiness and financial literacy classes. Specialized habilitation programs reinforce the organization's commitment to ensuring all individuals with disabilities and other barriers are embraced as valued and dignified members of our community.

Mental health and substance abuse	
treatment services provided by:	
Africentric Personal Development Shop, Inc.	Nonprofit behavioral healthcare center specializing in prevention, treatment, and recovery of substance abuse and domestic violence intervention education.
Amethyst	Non-profit organization offering long-term alcohol and drug treatment program for women, pregnant women and women with children within permanent supportive housing.
Columbus Area, Inc.	Non-profit organization offering outpatient substance abuse treatment and treatment for mental health issues.
Columbus Public Health	Local public health agency offering a substance abuse prevention program and outpatient substance abuse treatment.
CompDrug	Non-profit organization offering substance abuse prevention program and substance abuse treatment programs. Substance abuse treatment includes detoxification, withdrawal services and methadone maintenance.
Concord Counseling Services	Counseling agency that provides a wide range of outpatient counseling services for all ages. Offers outpatient substance abuse counseling and supportive services for persons with serious long-term mental illness.
House of Hope	A non-profit organization dedicated to providing substance abuse treatment. Services include outpatient substance abuse counseling, sober living home and substance abuse counseling for individuals who are deaf or hard of hearing.
North Central Mental Health	Comprehensive, community-based mental health and recovery agency. Services include substance abuse treatment and recovery, suicide prevention and general counseling.
Maryhaven	Behavioral healthcare facility that specializes in the treatment of individuals with substance abuse issues. Services include inpatient substance abuse treatment, detox services, outpatient substance abuse counseling and methadone maintenance services.

Notogra Aggasa	Non profit organization that offers a variety
Netcare Access	Non-profit organization that offers a variety of mental health services. Services include
	crisis intervention, medication
	management, drug and alcohol
	assessments and linkage to ADAMH
Couthoost Inc	system of care.
Southeast, Inc.	Non-profit organization that offers mental health services. Services include outpatient
	substance abuse treatment, outpatient and
	residential psychiatric treatment and
	outreach.
Southeast PATH (Mobile Psychiatric	PATH Mobile Van is a federal funded
Outreach)	program that provides engagement
	outreach and medication management for
	homeless persons with mental illness that
	are not connected to community mental
	health services.
COWIC	Non-profit organization that provides a
	workforce development system comprised
	of public and private partnerships that
	prepare adults and youth for the skilled
	jobs of today and the careers of tomorrow.
Older adult services provided by:	
Area Agency on Aging	COAAA provides programming and
	assistance to older adults 60 years and
	older in Central Ohio. Services include
	information and referral, PASSPORT, utility
	assistance, adult foster care and outreach.
Franklin County Office on Aging	County office provides information and
	services to Franklin County residents ages
	60 and older. Services include Senior
	Options, minor home repairs and adult
	protective services
Transportation services provided by:	
COTA	Public transportation system within
	Franklin County and contiguous counties.
Veterans services provided by:	
Franklin County Veterans Services	County agency dedicated to helping
Commission	veterans, active duty members of the
	Armed Forces of the United States, and
	their minor dependents. Services include
	emergency financial assistance and benefits assistance.

Chalmers P. Wylie VA Outpatient Clinic	A government health clinic that provides veterans with a continuum of care that is accessible, cost-effective, and of high quality; delivered in an environment that celebrates diversity and values education and research and creating a corporate culture that supports the development of a workforce that is caring, compassionate, competent, quality focused and customer oriented.
Other services provided by: CHOICES	Non profit organization that provides
CHOICES	Non-profit organization that provides services for victims and survivors of domestic violence. Services include emergency shelter, 24 hour crisis hotline, short-term individual and group counseling, outreach, community education/prevention, legal advocacy and support groups.
Central Community House	Settlement House offering social, child care, recreational, health and basic needs assistance.
Columbus Legal Aid Society	Non-profit organization offering legal services to low income individuals and families in civil legal matters.
Columbus Urban League	Non-profit organization that provides individual and family services include crisis intervention, support group for HIV/AIDS infected persons, advocacy, crisis assistance for victims and witnesses of a violent crime, landlord/tenant investigation and counseling. They also provide employment services, literacy programs and youth programs.
Community Mediation Services	Non-profit organization that offers mediation services as an alternative to further legal action and provide all parties with an agreeable outcome.

Gladden Community House	Neighborhood center offers after school activities and educational programs, emergency financial assistance, senior citizen outreach, emergency food, an all-day preschool and support for families who have open cases with Franklin County Children's Services. Clients must live in the following zip codes to qualify for most services: 43215 west of the river, 43222 and 43223.
Huckleberry House	Non-profit that offers a safe place for runaway youth in Columbus. Offers various programs to help teens who are in crisis situations, homeless or runaways.
HandsOn Central Ohio	Non-profit organization that operates a 24/7 information and referral line to connect individuals with community resources and volunteer opportunities.  Also operates the 24/7 CPoA/Homeless Hotline.
St. Stephens Community House	Settlement house that provides multiple services to the Linden area of Northeast Columbus. Services include emergency financial assistance, food pantry, senior services and child care.
Star House	Drop in center for homeless, unaccompanied youth between the ages of 14-24 in Columbus. Provides access to educational, employment, health care, and housing services.
СМНА	CMHA is the public housing authority for Franklin County. The agency develops, renovates and maintains housing, promotes neighborhood revitalization, and assists residents in accessing needed social services.

All CSB partner agencies are required to participate in operation workgroups in order to increase collaboration, coordinate services, and provide input for ending homelessness within the community. Various system level workgroups meet on a monthly basis (Adult System Operation Workgroup, Family System Operation Workgroup, Job2Housing Operation Workgroup, and Stable Families Operation Workgroup). Each agency is required to send a representative to the workgroup related to their population served, as outlined in their individual agency contracts with CSB.

#### Access to Public Education

The Case Manager shall ensure that children and youth served by the program have access to public education and that their rights are protected in accordance with Federal and state requirements. Additional coordination with Columbus City Schools' Project Connect staff is available. Compliance is enforced in accordance with CSB PR&C Standard F3.

## **Employment Linkages**

The Case Manager shall establish referral relationships with employers and employment programs for each family member who is seeking employment. In instances where additional job skills are necessary to elevate the client's income level to afford permanent affordable housing, the Case Manager shall link the client to local job training programs (COWIC, Goodwill, VOA, etc.) and encourage the client's motivation and engagement.

## Mental Health/Substance Abuse Counseling

The Case Manager shall refer any client that reports a mental health or substance abuse disorder to a reputable community provider for evaluation and ongoing treatment or to the centralized intake, assessment and referral point in Franklin County (Netcare Access). The Case Manager shall also refer any client that expresses concerns about and/or exhibits mental health or substance abuse symptoms.

# Credit Counseling/Financial Planning

The Case Manager shall assess a client's needs beginning at intake. If assistance is needed beyond the budget counseling performed by the Case Manager, the case manager will make a referral to consumer credit counseling and/or other financial planning organizations.

### **Enrollment in Community Benefits**

The Case Manager shall assist the client in applying for all community benefits including, but not limited to: TANF, Project Welcome Home, food stamps, public child care subsidy, Ohio Benefits Bank, PRC, OWF, Medicaid, Social Security benefits, etc.

## **Conflict of Interest**

As stated in all providers' contracts and enforced in accordance with CSB PR&C Standard C6: The Provider represents and warrants to CSB that no one receiving compensation from Funds is a voting member of the Board of Trustees of the Provider and covenants that no one receiving compensation from Funds shall be named or appointed as a voting member of the Board of Trustees of the Provider. For any Provider receiving federal funds, the Provider must disclose in writing any potential conflict of interest to CSB in accordance with federal regulation 2 CFR Part 200.112.