Homeless Program Standards

Ohio Balance of State Continuum of Care

December 22, 2015

Ohio BoSCoC Homeless Program Standards

The U.S. Department of Housing and Urban Development (HUD) via its Emergency Solutions Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules requires that Continua of Care (CoC) establish and consistently follow written standards for providing Continuum of Care assistance. The Ohio Balance of State Continuum of Care (BoSCoC), which represents the 80 largely suburban and rural counties in Ohio and the homeless programs and systems therein, has developed these Ohio BoSCoC Homeless Program Standards to fulfill these requirements and to help move the Ohio BoSCoC forward in achieving the Strategic Plan Vision of ending homelessness in the Ohio BoSCoC.

Background and Introduction

Continuum of Care
A Continuum of Care (CoC) is a geographically based group of representatives that carries out the planning responsibilities required by the U.S. Department of Housing and Urban Development's (HUD) CoC Program. These responsibilities include coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the CoC's geographic area.

The Ohio Balance of State Continuum of Care
The Ohio Balance of State Continuum of Care (BoSCoC) represents the 80 largely suburban and rural counties in Ohio. The Ohio BoSCoC is responsible for coordinating and implementing the homeless system for this 80-county geography. Within these 80 counties there are approximately 340 homeless programs including emergency shelters, transitional housing, rapid re-housing programs, and permanent supportive housing. On any given day, these programs can serve over 5,500 persons experiencing homelessness.

Ohio Balance of State Continuum of Care Homeless Planning Regions
The 80 counties in the Ohio BoSCoC are divided into 18 Homeless Planning Regions – see the map of the Homeless Planning Regions at the end of this document. Homeless program representatives in these Homeless Planning Regions plan and coordinate local and regional homeless systems and programs, and are responsible for working with Ohio Development Services Agency (ODSA) and Coalition on Homelessness and Housing in Ohio (COHHIO) to ensure all HUD homeless program requirements are met. The Homeless Planning Regions report to COHHIO and ODSA, not to HUD.

Role of ODSA and COHHIO
The Ohio Development Services Agency (ODSA) serves multiple roles within the Ohio BoSCoC. ODSA serves as the Collaborative Applicant for the Ohio BoSCoC and, in this role, is responsible for submitting to HUD the annual CoC Competition consolidated application and project priority listing. ODSA also serves as the Homeless Management Information System (HMIS) Lead Agency, meaning they are the HMIS grantee and administrator for the Ohio BoSCoC. Lastly, ODSA is also responsible for administering the state's homeless assistance programs – the Homeless Crisis Response Program (HCRP) and the Supportive Housing Program (SHP) – as well as the state's allocation of federal Emergency Solutions Grant (ESG) funding. ODSA distributes its ESG funding via HCRP.

The Coalition on Homelessness and Housing in Ohio (COHHIO) serves as the CoC Staff Lead for the Ohio BoSCoC. ODSA contracts with COHHIO to provide a CoC Director and Coordinator for the Ohio BoSCoC and to manage all aspects of the CoC, including work for the annual CoC Program Competition, and ensuring all federal CoC Program requirements are met. COHHIO also staffs the Ohio BoSCoC HMIS for ODSA, providing a team of four HMIS staff.

HMIS
All state and federally funded Ohio BoSCoC homeless projects must use the Ohio BoSCoC Homeless Management Information System (HMIS) to maintain client and project-level data. The Ohio BoSCoC HMIS is a valuable resource because of its capacity to integrate and unduplicate data across projects in our CoC. HMIS aggregate data can be used to understand the size, characteristics, and needs of the homeless population at the client, project, and community level. The only exception to the HMIS participation requirement is for domestic violence victim services agencies, which are prohibited from entering data into HMIS and must instead use a comparable database.

All Ohio BoSCoC homeless projects participating in HMIS must abide by the Ohio BoSCoC Policies and Procedures Manual, which lays out the CoC's policies related to maintaining system security and client confidentiality, as well as the CoC's processes for complying with all federal regulations related to the creation and maintenance of an HMIS. Homeless projects must also comply with the Ohio BoSCoC Data Quality Standards, which outline expectations for ensuring that quality data is entered into and maintained in the HMIS.

Ohio BoSCoC Homeless Program Standards: Overview

Purpose of Program Standards
HUD, via its Emergency Solutions Grant Rules and Regulations (ESG) and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rules, requires that Continua of Care (CoC) establish and consistently follow written standards for providing CoC and ESG assistance. The Ohio BoSCoC has developed these Ohio BoSCoC Homeless Program Standards to fulfill these requirements and to help move the Ohio BoSCoC forward in achieving its Strategic Plan Vision of ending homelessness in the Ohio BoSCoC.

In addition to meeting federal requirements, these standards will also help the Ohio BoSCoC ensure more consistent use of best practices and help to standardize program design and implementation across our homeless system.

Applicability of the Program Standards
The Ohio BoSCoC Homeless Program Standards outlined here apply to all homeless projects in the CoC, regardless of funding source. This includes homeless projects funded through HUD's CoC Program, HUD's ESG Program, and the state of Ohio's Supportive Housing Program (SHP) and Homeless Crisis Response Program (HCRP).

Items Addressed in the Program Standards
These Ohio BoSCoC Homeless Program Standards address the following items:
- Program compliance
- Participation in regional coordinated entry plans
- Program eligibility
- Serving families and transgender persons
- Documentation and Recordkeeping requirements
- Implementation of Housing First Practices
- PSH prioritization
- PSH centralized waitlists

Issues related to eligible costs/activities within federal and state funding sources, HMIS participation requirements, and performance and reporting requirements are not addressed here.

Standards for All Projects

All project types – Homelessness Prevention (HP), Emergency Shelter (ES), Transitional Housing (TH), Rapid Re-housing (RRH), Safe Haven (SH), and Permanent Supportive Housing (PSH) - must adhere to the following standards. Where there is some variation in applicability of the standards by project type, those variations will be noted in the following project sections. Although the following standards apply to all Ohio BoSCoC homeless projects, these standards are not exhaustive in terms of outlining all federal or state homeless program funding requirements, as noted above. All organizations operating homeless projects funded by a state or federal source (eg, ODSA or HUD) must ensure they read, understand, and comply with all program regulations.

CoC Program, SHP, and HCRP Compliance
Ohio BoSCoC homeless projects funded through HUD's Continuum of Care Program (CoC) must ensure they are operating in compliance with the CoC Program interim rule. Projects funded by Ohio Development Services Agency's Supportive Housing Program (SHP) or Homeless Crisis Response Program (HCRP) must ensure they are in compliance with all relevant state regulations. HCRP funded projects must also ensure they operate in

compliance with HUD's Emergency Solutions Grant (ESG) regulations, except where ODSA has implemented requirements that are more stringent than those of ESG. Any questions about whether ESG or ODSA regulations take precedence should be directed to staff in the Office of Community Development at ODSA.

Coordinated Entry

All homeless projects in the Ohio BoSCoC, including HP, ES, TH, RRH, SH, and PSH, must participate in their Homeless Planning Region's coordinated entry system. This includes using the region's common assessment forms, following the region's agreed upon referral process, using the region's common PSH waitlist, and anything else as appropriate.

Upon adoption of these Ohio BoSCoC Homeless Program Standards, all Homeless Planning Regions must review their coordinated entry plans and update as necessary to ensure there are no contradictions between the coordinated entry system and these program standards. Any needed updates to coordinated entry plans must be completed and communicated to the public, as appropriate. More detailed information about requirements for implementation of these program standards can be found in the appendix.

Homeless Program Eligibility

Persons served by ES, TH, RRH, SH, and PSH must be defined as homeless according to HUD's *Homeless* definition, as follows:

The *Homeless* definition is comprised of four categories:
1. Literally homeless individuals/families
    a. Literal homelessness is further defined as homeless individuals/families who lack a fixed, regular, and adequate nighttime residence, meaning:
        i. Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
        ii. Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
        iii. Exiting an institution where the individual resided for less than 90 days and where the individual entered the institution immediately from emergency shelter (including hotel/motel stays paid for by charitable or government programs) or an unsheltered location
2. Individuals/families who will imminently (within 14 days) lose their primary nighttime residence with no subsequent residence AND no resources or support networks
3. Unaccompanied youth or families with children/youth who meet the homeless definition under another federal statute and 3 additional criteria[1]
4. Individuals/families fleeing or attempting to flee domestic violence with no subsequent residence AND no resources or support networks

Not all homeless projects are permitted to serve people defined as homeless under all four categories of the *Homeless*s definition. Further details regarding eligibility by program type are as follows:
- Homelessness Prevention
    o Can serve persons in Category 2 – Imminent Risk of Literal Homelessness
    o Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)
    o Or be defined as at-risk of homelessness, according to HUD's *At-Risk of Homelessness* definition
- Emergency Shelters
    ▪ Category 1 – Literally Homeless
    ▪ Category 2 – Imminent Risk of Literal Homelessness
    ▪ Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)
- Transitional Housing
    ▪ Category 1 – Literally Homeless
    ▪ Category 2 – Imminent Risk of Literal Homelessness
        ▪ Ohio BoSCoC TH projects are strongly encouraged to only serve persons at imminent risk of literal homelessness if there are no emergency shelters within their service area. See the TH project section later in this document for more detailed information.

---

[1] *Ohio BoSCoC homeless projects are not permitted to serve anyone defined as homeless under category three of the federal definition.*

- ▪ Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)
- Rapid Re-housing
  - ▪ Category 1 – Literally Homeless
    - ▪ CoC-funded RRH projects are further limited to serving category 1 homeless who are residing in emergency shelters or in unsheltered locations only
- Safe Havens
  - o Category 1 – Literally Homeless
    - ▪ SH projects are further limited to serving category 1 homeless who are residing in unsheltered locations only
  - o Additionally, SH clients must have a severe and persistent mental illness and this must be documented appropriately
- Permanent Supportive Housing
  - o Category 1 – Literally Homeless
  - o Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)
    - ▪ PSH projects are only permitted to serve persons fleeing DV if those people have already entered an emergency shelter or TH project. PSH projects cannot serve people coming directly from DV situations in which they were residing in housing
  - o Additionally, PSH project clients must be disabled and this must be documented appropriately

More detailed information and official HUD guidance on the homeless definition and program eligibility can be found at https://www.hudexchange.info/coc/coc-program-law-regulations-and-notices/.

Serving Families in Homeless Projects
Equal Access
Ohio BoSCoC homeless projects serving families must ensure they comply with the Equal Access Rule, as outlined by HUD. The Equal Access Rule outlines the federal definition of 'family' for purposes of receiving assistance from certain programs. For Ohio BoSCoC homeless projects, the definition of 'family' is as follows:
- *Family* includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Ohio BoSCoC homeless projects cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. More specifically, all Ohio BoSCoC homeless projects with dedicated family beds/units must serve families, regardless of the marital status or sexual orientation of the adults.

There are some very limited exceptions to this rule, however, for those programs funded through special initiatives under the annual CoC Competition. For example, if your project was funded as a new Rapid Re-Housing (RRH) program in the FY2013 CoC Competition, that Notice of Funding Availability (NOFA) limited RRH eligibility to households with children only. Therefore, RRH projects funded through the FY2013 CoC Competition would be permitted to only serve families with children (excluding households comprised of only adults) because of the more limited requirements placed on them in that year's NOFA.

Keeping Families Intact
Ohio BoSCoC emergency shelter projects serving families are required to serve the intact family, where desired by the client. Family members, regardless of age, gender, or other factors, cannot be separated from other family members during their program stay.

Serving Transgender Persons in Emergency Shelters and Other Sex-Segregated Facilities
Ohio BoSCoC emergency shelters must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation, or gender identity. Although emergency shelters with shared sleeping areas or bathrooms are permitted to inquire about sex or gender identity for purposes of determining room assignment, best practices suggest that where there is uncertainty about sex or gender identity shelter providers should ask where individuals feel most comfortable sleeping. This may mean that the person should be

provided with a private changing, shower, and/or sleeping space, or stagger use of facilities so that the person may shower and change alone. Decisions about how and where someone is housed should be made on a case-by-case basis strongly taking into account the person's preference about where to sleep, and keeping safety a priority.

In situations where providers are unsure of a person's sex or gender identity, providers may not ask for documentation of sex or gender. The best way to proceed if a provider is unsure is to tell a client that the agency provides shelter according to the gender with which the client identifies. Do *not* ask, "What is your sex/gender?" *Do* say, "This is a shelter for women, if you would rather be in a different shelter, let us help you find one where you feel safe and comfortable." It is understood that not every facility can accommodate every gender expression. The spirit of this guidance is about helping people to feel safe and comfortable in their temporary accommodations. This may mean telling a client what the local options are, *without* asking about their gender, and doing the most possible to get that person to a place they want to be. Gender-based violence can be inflicted on transgender people and providers are obligated to protect transgender people from such violence the same way they protect women, for example, from violence.

Ohio BoSCoC emergency shelters and other homeless program providers should review the HUD notice, *Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities,* in order gain a comprehensive understanding of how the notice affects both clients and providers, and guides protocols, policies, and procedures. The notice can be found at https://www.hudexchange.info/resource/4428/notice-cpd-15-02-appropriate-placement-for-transgender-persons-in-single-sex-emergency-shelters-and-other-facilities

Documentation and Recordkeeping Requirements
All homeless projects in the Ohio BoSCoC must maintain standard operating procedures for ensuring that state and federal program funds are used in accordance with all requirements. These procedures should include maintaining sufficient agency and client records.

Organizational Recordkeeping Requirements
Ohio BoSCoC homeless projects must maintain the following records at the organizational level:
- Standard Operating Procedures – maintain procedures for ensuring that program funds are used in accordance with all applicable requirements.
- Conflict of Interest Policies – maintain conflict of interest policies and evidence compliance with CoC, organizational, or funding entity conflict of interest requirements
- Homeless Consumer Participation (CoC-funded projects only) – maintain evidence that at least one homeless or formerly homeless individual sits on the board of directors or other equivalent policymaking entity
- Affirmatively Furthering Fair Housing (CoC-funded projects only) – document compliance with the requirement that they are making appropriate efforts to reach out to eligible program participants who would be least likely to apply for program participation without such effort.

Grant-Specific Recordkeeping Requirements
Ohio BoSCoC homeless projects must also maintain the following records pertaining to their specific projects:
- Project-Specific Policies and Procedures – maintain policies and procedures regarding documentation of program participant eligibility and all other aspects of program operation to ensure compliance and consistency among staff
- Services Provided – document the types of supportive services provided to participants and the amount spent on those services, as well as evidence that ongoing assessment of overall service needs was offered and/or provided.
- Housing Quality Standards – where required to be conducted, retain documentation demonstrating that HQS inspections were completed for units paid for with leasing or rental assistance funds.
- ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing – where required to be conducted, retain documentation demonstrating that habitability inspections were completed for ESG-funded projects
- Match – maintain records of the source and use of all cash and in-kind contributions used to satisfy federal/state match requirements. These records must further indicate the grant/project and fiscal year for which the matching contributions were provided.

Program Participant Recordkeeping Requirements

Ohio BoSCoC homeless projects must document and maintain records related to participant eligibility and the services provided to participants. An overview of these requirements is as follows:

- Homeless Status – maintain records documenting acceptable evidence of participants' homeless status. Acceptable evidence generally includes third party written verification of participants' stay in an unsheltered location, in an emergency shelter, or in a Transitional Housing program (where participants are eligible to move from TH into RRH or PSH, for example). These records must comply with CoC Program or ODSA requirements, depending on funding source
  - o Remember, when documenting homeless status, HUD requires compliance with their preferred order of priority. This means that homeless status must be documented first with third-party written verification of homelessness (eg, HMIS record, documentation on letterhead from shelter or TH project). If that documentation is not attainable, only then can third-party oral verification be used as documentation, and only after case workers have documented their due diligence in attempting to obtain third-party written verification of homeless status. Self-certification of homeless status is only permitted if neither third-party written nor third-party oral verification could be obtained, and due diligence was documented.
- Other Program Eligibility Verification – document compliance with any other program eligibility criteria, such as disability status
- Services and Assistance Provided – homeless projects must keep records for all program participants that outline the service provided, including:
  - o Evidence that, at minimum, an annual assessment of service needs was completed (certain programs require more frequent assessment)
  - o In cases of participant termination from a program, the project must demonstrate that it followed all applicable federal requirements
- Annual Income – when any kind of rent is paid by program participants or when program eligibility is based in part on income, the homeless project must keep the following documentation of annual income:
  - o Income evaluation form (some programs require that specific forms be completed)
  - o Source documents (wage statements, bank statements, etc)

Housing First
All homeless projects in the Ohio BoSCoC must adopt a Housing First approach. Adoption of Housing First practices will be documented via program policies and procedures, and any other relevant documents, that evidence the incorporation of the practices into the design and operation of the project.

At its most basic, Housing First is a model of housing assistance that centers on providing people experiencing homelessness with housing first and then providing voluntary services as needed and desired. Housing First programs operate under the assumption that everyone is ready for housing.

In addition to the basic idea of providing housing first, Housing First programs share a few critical elements, including:
- Rapid exit from homelessness
- Minimal barriers to program entry
- Voluntary Supportive Services
- Housing Focused Assistance

Rapid Exit From Homelessness
Whether at the emergency shelter or permanent housing point, Housing First providers work to get homeless individuals and families out of homelessness and into permanent housing as quickly as possible. For shelter providers, this means working hard to identify any rapid re-housing assistance that may be needed to move the household out of homelessness, or referring to permanent supportive housing where available and appropriate. For permanent housing providers, this means speeding up and/or streamlining intake processes wherever possible, and ensuring that prioritized clients are coming from literally homeless locations.

Minimal Barriers to Program Entry
In the past, many homeless programs had policies that would prevent homeless persons from entering the program if they didn't meet a number of requirements. Common program requirements often included having a minimum income, no criminal history, no history of substance abuse (sometimes drug tests were used to confirm), poor rental history or evictions, and no past involuntary terminations from other homeless programs. Housing First programs, in contrast, remove every barrier to entry possible, in part to make their programs and services

available to those with the most severe needs and longest histories of homelessness, ie, people who likely would have been screened out of their program under previous practices.

Although the Housing First model involves reducing barriers to entry, including removing drug testing at program entry, this does not mean that homeless services providers are required to serve/house persons who are significantly under the influence or actively using to the point where their presence in the program poses a danger to themselves, staff, or other residents. For example, in some instances, homeless persons who are in active withdrawal from substances may need to be referred for medical attention rather than accepted into a program. In all cases, homeless program staff should do their due diligence to find alternative means of shelter/housing in the event that their program is unable to serve a client based on safety issues related to substance use.

A common practice, particularly among emergency shelters and other congregate facilities, is to conduct background checks on prospective clients. This practice is not prohibited under Housing First practices. However, program policies should only deny program entry in cases where a criminal history shows a pattern of violent offenses (including violent sexual offenses). Past convictions for public intoxication or disorderly conduct, for example, should not, in and of themselves, cause a homeless person to be denied entry into a homeless program. Clients should also not be denied services or shelter while waiting on the results of the background check. In addition, homeless program staff should do their due diligence to find alternative means of shelter/housing in the event that their program is unable to serve a client based on the client's criminal background.

Voluntary Supportive Services
The Housing First model requires that all supportive services be offered to clients on a voluntary basis. Refusal to participate in supportive services cannot be a reason to terminate someone from a homeless program. However, even under a voluntary services model, clients may be required to participate in regular assessment of needs in order to determine if ongoing assistance is needed and desired – in fact, monthly meetings with case management staff are required in CoC-funded rapid re-housing programs. Similarly, PSH projects should regularly check in with all clients, including those not receiving or requesting supportive services, to ensure that the client has ongoing need for PSH.

Housing Focused Assistance
Housing First programs offer voluntary supportive services that are first and foremost focused on obtaining and maintaining housing. In emergency shelters, for example, case managers should work with shelter residents to identify permanent housing options and help residents get connected to housing. Homeless programs providing supportive services designed to address other persona issues should ensure that those services are directly connected to helping clients obtain or maintain housing.

More detailed information about how Housing First practices should be implemented in different project types can be found in the following project sections.

Additional information about Housing First practices can be found at the following links:
- http://www.endhomelessness.org/pages/housing_first
- http://usich.gov/usich_resources/solutions/explore/housing_first
- http://www.desc.org/housingfirst.html

Homelessness Prevention Standards

The purpose of Homelessness Prevention (HP) projects is to prevent individuals and families who are at greatest risk of homelessness from becoming literally homeless.

Homelessness Prevention Eligibility
Homelessness Prevention (HP) projects must serve persons who meet category 2 or 4 of HUD's homeless definition, as outlined in the previous section, or persons who meet HUD's definition of At-Risk of Homelessness. Providers should remember that the individuals/families defined as At-Risk of Homelessness must meet all of the following criteria:
- Have annual income below 30% AMI
- Do not have sufficient resources or support networks immediately available to prevent literal homelessness
- Meet at least one of the following seven conditions:

- o Moved two or more times due to economic reasons in 60 days prior to application for assistance
- o Living in home of another due to economic hardship
- o Losing housing within 21 days after application date
- o Live in hotel/motel not paid for by charitable organizations or federal/state/local government programs
- o Live in severely overcrowded unit as defined by the US Census Bureau
- o Exiting publicly funded institution or system of care
- o Live in housing associated with instability and increased risk of homelessness, as defined in the Con Plan

Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented as described in the previous section.

Documentation and Record-keeping Requirements
All Ohio BoSCoC HP projects must ensure they abide by all the documentation (of homeless or at-risk of homelessness status and project eligibility) and record-keeping requirements.

Housing First in Homelessness Prevention
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For HP projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Reducing barriers to entry
    - o HP projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements and population prioritizations. At minimum, HP projects CANNOT require the following as a condition of entry in to the project:
        - ▪ Minimum income level and/or employment
            - • Although it is reasonable to expect that a client assisted with HP will be able to obtain employment/income at some point before HP assistance ends, receipt of income cannot be an eligibility criterion
        - ▪ Completion of drug test
    - o HP projects should screen people applying for prevention assistance to identify people with greater vulnerabilities and/or urgency, ie, closer to becoming literally homeless, to prioritize applicants for assistance when demand exceeds resources
        - ▪ For example, HP projects should consider limiting provision of assistance only to those households already in doubled-up situations, rather than serving persons residing in their own rental unit. Households already doubled-up are often more at risk of literal homelessness than those still in their own unit.

Housing First in Program Design
- Voluntary Supportive Services
    - o HP projects must offer services to program participants on a voluntary basis. However, HP projects may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing/maintaining housing.
- Housing Focused Assistance
    - o HP projects' primary goal is to prevent literal homelessness as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining or maintaining permanent housing.
    - o HP financial assistance (ie, rental assistance) is individualized and flexible. This means, for example, that HP projects do not have a policy of providing only one month of financial assistance, for example. All HP projects should assess program participants' need to determine their individualized amount of financial assistance and the duration of that assistance.

Emergency Shelter Standards

The purpose of Emergency Shelter (ES) projects is to provide temporary shelter to individuals and families who are homeless and have no other housing options or resources to obtain housing, and to re-house those persons as quickly as possible.

Background Information
HUD's Emergency Solutions Grant (ESG) program, which provides federal resources for emergency shelter and homelessness prevention (HP) and rapid re-housing (RRH) activities, requires ESG recipients and/or sub-recipients to develop program standards for providing assistance. These standards must include, in part, policies governing shelter stays, prioritization for HP and RRH assistance, and policies related to the amount and duration of RRH assistance that may be provided. Details about the ESG program requirements can be found at https://www.hudexchange.info/esg/esg-law-regulations-and-notices.

For most Ohio BoSCoC communities, ODSA serves as the recipient of ESG funds for the state of Ohio and subgrants these funds to shelters and HP/RRH providers via its Homeless Crisis Response Program (HCRP). Through HCRP, ODSA also required the Homeless Planning Regions to create their own written program standards, in compliance with the ESG program. Homeless Planning Regions should update their local standards for shelters, HP, and RRH to ensure they comply with these Ohio BoSCoC Homeless Program Standards.

Emergency Shelter Eligibility
Emergency shelter (ES) projects must serve persons who meet category 1, 2, or 4 of HUD's homeless definition, as outlined in the previous section. Providers should remember that to be defined as homeless under category 2 of HUD's homeless definition, individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented as described in the previous section.

ES projects must comply with HUD's requirements related to the definition of family as outlined earlier in this document, and they must keep families intact.

Documentation and Record-keeping Requirements
All Ohio BoSCoC ES projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Housing First in Emergency Shelters
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For ES projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Diversion
    - ES projects should divert people/households with other housing options or resources away from shelter and offer immediate linkage to homelessness prevention resource where needed, desired, and available.
- Reducing barriers to entry
    - ES projects must minimize any barriers to entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility requirements. At minimum, ES projects CANNOT require the following as a condition of entry in to the project:
        - Minimum income level
        - Completion of drug test
    - ES projects should not have policies that prohibit or limit returns to the project for more than 30 days immediately after client exit, except for cases in which a program participant poses a danger to other residents or staff. For example, shelters cannot have a policy that prohibits participants' return to shelter within 6 months or 1 year of exit. Persons experiencing homelessness should be provided with shelter when needed, regardless of past episodes of homelessness or past stays in a particular shelter.
        - Where a shelter applicant cannot be served b/c of concerns about resident and/or staff safety, shelter staff are obligated to work with the applicant to identify another housing/shelter option.

Housing First in Program Design
- Voluntary Supportive Services
    - ES projects must offer supportive services to program participants on a voluntary basis. However, ES projects may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing housing.
- Housing Focused Assistance
    - ES projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, but they are tailored to the client's needs as they pertain to obtaining permanent housing.

Transitional Housing Projects Standards

The purpose of Transitional Housing (TH) projects is to facilitate the movement of homeless individuals and families to permanent housing as quickly as possible. TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing.

Transitional Housing Eligibility
All TH projects must serve persons who meet category 1 or 4 of HUD's homeless definition.

TH projects are discouraged from serving individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition). This could include individuals or families currently living with family/friends, or living in a hotel/motel that they pay for themselves. However, TH projects with self-defined service areas (as identified in grant applications and agreements) in which there is no emergency shelter are permitted to serve individuals/families meeting category 2 of HUD's homeless definition. Additionally, if the only emergency shelter in the TH project's service area serves a population other than the local TH project's target population, the TH project may serve individuals/families in category 2 of HUD's homeless definition. For example, if your TH project only serves families with children, but the emergency shelter in your service area serves only single men, then your TH project may serve people who are category 2 of the homeless definition since there is no local shelter that can serve them. These are the only exceptions to the TH project eligibility standard outlined here.

TH project recipients permitted to serve category 2 homeless should remember that to be defined as homeless under category 2 of HUD's homeless definition individuals/families must be imminently losing their housing AND have no subsequent residence identified AND lack resources or supports to obtain other permanent housing. All of these must be documented.

Documentation and Record-keeping Requirements
All Ohio BoSCoC TH projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Transitional Housing Prioritization
TH projects should be targeted to persons who have been assessed as not being able to quickly resolve their homelessness on their own, but who do not have needs great enough to necessitate placement into Permanent Supportive Housing. Appropriate target populations may include those with service needs that have been identified as being more long-term in duration, but not indefinite. Appropriate target populations may include domestic violence victims, individuals with histories of substance abuse disorders or those in early recovery, or transition age youth. Within identified target populations, TH projects should further screen homeless applicants to identify people with greater vulnerabilities and prioritize those applicants for assistance.

Additional Identification of Target Populations
TH project recipients wishing to consider serving target populations not listed in the preceding sentence, must first discuss proposed plans with Ohio BoSCoC CoC Staff to ensure the target population is appropriate for TH.

Housing First in Transitional Housing
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For TH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Reducing barriers to entry
  - TH projects must minimize any barriers to applicant's entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any population prioritization) requirements. At minimum, TH projects CANNOT require the following as a condition of entry in to the project:
    - Minimum income level
    - Completion of drug test
  - TH projects should prioritize for assistance those persons with greater vulnerabilities. This may be determined, in part, through local/regional common assessment tools

Housing First in Program Design
- Voluntary Supportive Services
  - TH projects must offer supportive services to program participants on a voluntary basis. However, TH projects may require program participants to meet with case managers on a regular basis for purposes of evaluating the extent to which participants have ongoing need for the TH project assistance.
- Housing Focused Assistance
  - When screening applicants for admission into the TH project, TH projects must assure that applicants are linked with TH assistance when:
    - TH is desired by the applicant
    - TH is most appropriate to meet health and safety needs of the applicant
    - No permanent housing solutions (with or without services) are available that similarly or better meet the desires and needs of the applicant
  - TH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining permanent housing.

Special Guidance for TH Projects Serving People with Substance Abuse Disorders
TH projects serving persons with substance abuse disorders should keep in mind that their primary goal is to place program participants into permanent housing as quickly as possible. This means that any treatment-related services should only be offered to clients on a voluntary basis, and they should focus on treatment related issues that are immediate barriers to securing and maintaining housing.

TH projects serving people with substance abuse disorders should not terminate a client from their program simply because of a relapse in substance use. Relapses should instead be used to facilitate conversations with clients to determine their service needs and desires.

Rapid Re-Housing Projects Standards

The purpose of Rapid Re-Housing (RRH) projects is to move homeless individuals and families out of emergency shelter (and, in some cases, out of TH) to permanent housing as quickly as possible.

Rapid Re-Housing Eligibility
All RRH projects must serve persons who meet category 1 of HUD's homeless definition. For RRH, category 1 of the homeless definition ONLY includes individuals and families who are sleeping in a place not meant for human habitation or living in an emergency shelter meant to provide temporary living arrangements. Moreover, although RRH projects/services funded through HCRP are permitted to serve households currently residing in TH, RRH projects funded through HUD's CoC Program are only permitted to serve persons/households currently in emergency shelter or unsheltered locations (eg, sleeping in a car, in an encampment, etc).

RRH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

Documentation and Record-keeping Requirements

All Ohio BoSCoC RRH projects must ensure they abide by all the documentation (of homeless status and project eligibility) and record-keeping requirements.

Rapid Re-Housing Prioritization
Where possible, RRH projects should be targeted to individuals and households who are unable to resolve their homelessness on their own but do not have service needs so great as to necessitate movement into TH or PSH. Within this targeted population, RRH providers should prioritize for assistance those people with greater vulnerabilities and less likelihood of exiting homelessness "but for" rapid re-housing assistance. RRH projects should strive to serve as many appropriate participants as possible, adjusting the duration and amount of assistance in order to meet the individualized needs.

Additionally, in cases where an eligible homeless veteran has been identified, and that veteran is not eligible for VA programs, RRH providers should prioritize the homeless veteran for assistance.

Housing First in Rapid Re-housing
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For RRH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Reducing barriers to entry
    - RRH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any population prioritization) requirements. At minimum, RRH projects CANNOT require the following as a condition of entry in to the project:
        - Minimum income level and/or employment
            - Although it is reasonable to expect that a client assisted with RRH will be able to obtain employment/income at some point before RRH assistance ends, receipt of income cannot be an eligibility criterion
        - Completion of drug test
    - RRH projects should prioritize for assistance those persons with greater vulnerabilities. This may be determined, in part, through local/regional common assessment tools

Housing First in Program Design
- Voluntary Supportive Services
    - RRH projects must offer supportive services to program participants on a voluntary basis. However, RRH projects may require program participants to meet with case managers on a regular basis (monthly for RRH projects funded through the CoC Program) for purposes of ensuring the household is stable in housing. Additionally, RRH projects may require program participants meet with case managers within three months of moving into housing for a reassessment to determine if participants having ongoing need for financial assistance and/or supportive services, and to determine if the household is still income eligible.
- Housing Focused Assistance
    - RRH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining and retaining permanent housing.
    - RRH financial assistance, i.e., rental assistance, is individualized and flexible. This means, for example, that RRH projects do not have a policy of providing only one month of financial assistance. All RRH projects should assess program participants' need to determine their individualized amount of financial assistance and the duration of that assistance.

Determining Rental Assistance Provided
All Ohio BoSCoC RRH projects must adhere to the following standards to determine the amount and duration of RRH assistance that can be provided to program participants.

Amount of Rental Assistance
Regional Executive Committees, in collaboration with HCRP Lead Agencies, can establish their own local policies/procedures for determining how much RRH rental assistance to provide and/or what amount or percentage program participants should contribute towards their rent. For example, a Region may determine that

all participants will pay 30% of their income towards their rent and RRH will pay the rest; or the Region may decide that they will pay 100% of the rent for the first three months (if three months of assistance is needed), but only 50% in any subsequent months. Regardless of how the local policy is designed, it must be implemented consistently across programs within the region.

Local policies and procedures should also adhere to the *Housing First in RRH* section above. Namely, this means that local policies and procedures should center on the provision of RRH rental assistance that is individualized and flexible. No RRH project should have a uniform policy of providing only one month of rental assistance, for example, as this kind of policy is not driven by participant's assessed needs.

Duration of Rental Assistance
Regional Executive Committees, in collaboration with HCRP Lead Agencies, can establish their own local policies/procedures for determining the maximum duration of rental assistance that they seek to provide to participants. The maximum duration of assistance should serve as a goal for the project, not a hard and fast rule. Ultimately, the duration of rental assistance provided to households should be determined by completing a needs assessment and identifying the amount of assistance needed to move the household into housing and stabilize them.

Safe Haven Projects Standards

There is only one CoC-funded Safe Haven (SH) project in the Ohio BoSCoC, and it is located in Jefferson County. No new Safe Haven projects will be funded or become operational going forward, as HUD no longer funds this project type. Safe Havens are a form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.

Safe Haven Eligibility
SH projects must serve persons who meet category 1 of HUD's homeless definition AND who reside on the streets or places not meant for human habitation AND who have a severe and persistent mental illness.

SH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition), or those who are coming from emergency shelters, transitional housing, or institutional stays.

Documentation and Record-keeping Requirements
All Ohio BoSCoC SH projects must ensure they abide by all the documentation (of homeless status, project eligibility, and disability) and record-keeping requirements.

Safe Haven Prioritization
Ohio BoSCoC Safe Havens must prioritize chronically homeless persons with severe and persistent mental illness who are currently unsheltered for their assistance first, in all cases. Furthermore, when multiple unsheltered chronically homeless persons are identified, the chronically homeless persons with the longest histories of homelessness, most severe service needs, and lack of connection to any current service provider should be prioritized before other chronically homeless persons with less severe needs and/or shorter histories of homelessness.

Housing First in Safe Havens
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For SH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Diversion
    - SH projects should divert people/households with other housing options or resources away from SH units (drop-in center activities excluded) and offer immediate linkage to homelessness prevention resource where needed, desired, and available.
- Reducing barriers to entry
    - SH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond

demonstrating meeting basic eligibility requirements. At minimum, SH projects CANNOT require the following as a condition of entry in to the project:
- Minimum income level
- Completion of drug test
  - Keep in mind, however, that use of illegal drugs on the SH property is prohibited

Housing First in Program Design
- Voluntary Supportive Services
  - SH projects must offer supportive services to program participants on a voluntary basis. However, SH's may require program participants to meet with case managers on a regular basis for purposes of working through plans/steps related to overcoming immediate and direct housing barriers and securing permanent housing.
- Housing Focused Assistance
  - SH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, but they are tailored to the client's needs as they pertain to obtaining permanent housing.

Permanent Supportive Housing Projects Standards

Permanent Supportive Housing Eligibility
All Ohio BoSCoC PSH projects must serve persons who meet category 1 of HUD's homeless definition AND are diagnosed with a disability. More detailed information can be found in the following sections regarding who should be *prioritized* for PSH.

PSH Eligibility When Fleeing DV (category 4 of the homeless definition)
Ohio BoSCoC PSH projects can serve disabled individuals/households fleeing DV (category 4 of the homeless definition), but the people fleeing DV must reside in a shelter or TH immediately prior to entering the PSH project. Persons fleeing DV cannot enter PSH directly from a housed situation.

PSH projects are NOT permitted to serve individuals or families who are imminently at risk of losing their housing (category 2 of the homeless definition).

PSH Eligibility for Chronically Homeless
For PSH projects dedicated to or prioritizing chronically homeless, category 1 of the homeless definition ONLY includes individuals and families who are sleeping in a place not meant for human habitation, or living in an emergency shelter/safe haven (and meet all other elements of the chronically homeless definition). Although non-chronic dedicated PSH projects are technically permitted to serve persons/households currently in TH, communities and providers should keep in mind that *requiring* persons to move into TH prior to entering PSH contradicts system and project-level Housing First practices. This is discussed in more detail in the following *Housing First in Permanent Supportive Housing* section.

The definition of chronically homeless is as follows:

a) An individual who:
   1. Is currently homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; AND
   2. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven. AND
   3. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;

b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph a of this definition before entering that facility; or

c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph a of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

More detailed information about HUD's final rule on the definition of chronically homeless can be found at https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/.

Documentation and Record-keeping Requirements
All Ohio BoSCoC PSH projects must ensure they abide by all the documentation (of homeless status, project eligibility, chronic homeless status (where applicable), and disability) and record-keeping requirements.

Permanent Supportive Housing Prioritization
All Ohio BoSCoC PSH projects must prioritize chronically homeless individuals/families first, in all cases, and must follow the order of priority described in detail below. Furthermore, when multiple chronically homeless are identified, those individuals/families with the longest histories of homelessness and with the most severe service needs should be prioritized before other chronically homeless with less severe needs and/or shorter histories of homelessness.

Additionally, in cases where an eligible chronically homeless veteran has been identified, and that veteran is not eligible for VA programs, PSH providers should prioritize the homeless veteran for assistance.

Prioritizing PSH projects/units for chronically homeless means implementing an admissions preference for those persons meeting the definition. All Ohio BoSCoC PSH projects - both those that are dedicated to serving chronically homeless persons and those that prioritize serving chronically homeless persons - must use the following order of priority for identifying who should be served. In order to adhere to the order of priority, PSH projects would first seek to identify a homeless person on their waitlist who meets the First Priority under the Chronically Homeless Order of Priority for PSH Projects section below. If no one who meets that priority can be found within a reasonable amount of time, then the PSH project may move to the second priority, and on down from there. The order of priority is as follows:

Chronically Homeless Order of Priority for PSH Projects
1) First Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness AND the Most Severe Service Needs
   a) Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, *where the cumulative total length of the four occasions equals at least 12 months*; AND
   b) Have been identified as having the most severe service needs as evidenced by a history of high utilization of crisis services, including but not limited to, emergency rooms, jails, and psychiatric facilities, or significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing
      i. PSH projects should use their regional coordinated entry assessment tools to determine the service needs of potential chronically homeless participants. Results of assessment may be combined with knowledge of crisis services utilization to determine prioritization based on service needs.
      ii. And meet all other elements of the chronically homeless definition

2) Second Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness
   a) Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, *where the cumulative total length of the four occasions equals at least 12 months*
      i. And meet all other elements of the chronically homeless definition

3) Third Priority – Chronically Homeless Individuals and Families with the Most Severe Service Needs
   a) Have been identified as having the most severe service needs as described in paragraph (1b) above
      i. And meet all other elements of the chronically homeless definition

4) Fourth Priority – All Other Chronically Homeless Individuals and Families
   a) Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, *where the cumulative total length of the four occasions equals at least 12 months*
      i. And meet all other elements of the chronically homeless definition

Ohio BoSCoC PSH Projects should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a PSH project designed to serve families only would not be required to serve a single chronically homeless individual. Instead, that project would prioritize any chronically homeless families (including families of two or more adults who present as a family, as described in the section about the Equal Access Rule) for their project, following the order of priority outlined above.

Please note, if no chronically homeless individuals or families are immediately identified, the PSH project may keep the rental assistance or PSH unit available for a short period of time while waiting for a chronically homeless household to be found – waiting up to 30 days is common practice, for example. After that time, the PSH project should move forward with serving the next prioritized individual or family, following the order of priority outlined below. PSH units should not sit empty for lengthy periods of time in order to wait for chronically homeless to be identified – this applies to both PSH projects that prioritize chronically homeless and those that are dedicated to chronically homeless.

If no chronically homeless persons are identified within a PSH project's self-defined service area (as identified in grant applications and agreements), then those projects should use the following order of priority to determine who should be prioritized for the PSH:

Additionally, in cases where an eligible non-chronically homeless veteran has been identified, and that veteran is not eligible for VA programs, PSH providers should prioritize the homeless veteran for assistance.

Non-Chronically Homeless Order of Priority
1) First Priority – Homeless Individuals and Families with the Most Severe Service Needs
   a) Have been identified as having the most severe service needs as described in paragraph 1b above.
      i. And meet all other PSH eligibility criteria

2) Second Priority – Homeless Individuals and Families with a Long Period of Continuous or Episodic Homelessness
   a) Have been living in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last three years *where the cumulative total was at least 6 months*.
      i. And meet all other PSH eligibility criteria

3) Third Priority – Homeless Individuals and Families Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters
   a) Have been living in a place not meant for human habitation, a safe haven, or an emergency shelter.
      i. And meet all other PSH eligibility criteria

4) Fourth Priority – Homeless Individuals and Families Coming from Transitional Housing
   a) Coming from transitional housing (TH), where prior to residing in the TH they lived on the streets, an emergency shelter, or a safe haven. The priority also includes homeless individuals and families with a qualifying disability who were fleeing domestic violence or sexual assault and are living in TH, even if they did not live on the streets or in a shelter prior to entry into the TH project.
      i. And meet all other PSH eligibility criteria

Assessing Severity of Need
Ohio BoSCoC PSH projects should use their region's common assessment tool to help determine the severity of service needs of homeless persons on local PSH waitlists, if possible. If information about homeless persons' use of local crisis services is available as well, this information may supplement the assessment information in order to better understand severity of need.

Over the next several months, Ohio BoSCoC staff will work towards identifying and adopting a common assessment tool across the full CoC that has the ability to determine homeless persons severity of need and prioritization for PSH.

Housing First in Permanent Supportive Housing
All Ohio BoSCoC homeless assistance projects must follow a Housing First approach. For PSH projects, the following practices and policies must be adopted and implemented at minimum:

Housing First at Program Entry
- Reducing barriers to entry
    - PSH projects must minimize any barriers to homeless persons/households entry into their project. This means that projects cannot require things of potential clients to enter their project over and beyond demonstrating meeting basic eligibility (and any prioritization) requirements. At minimum, PSH projects CANNOT require the following as a condition of entry in to the project:
        - Minimum income level and/or employment or ability to obtain income/employment
        - Completion of drug test
        - Participation in TH program prior to entering PSH
    - PSH projects must assess people applying for the project to identify people with greater vulnerabilities to prioritize applicants for assistance, based on the order of priority outlined in the preceding section

Housing First in Program Design
- Voluntary Supportive Services
    - PSH projects must offer supportive services to program participants on a voluntary basis. However, PSH projects may require program participants to meet with case managers on a regular basis for purposes of ensuring the household is stable in housing and has ongoing need for services.
    - PSH projects should work with program participants on a regular basis to identify a plan for assessing for reduced supportive service needs and possible movement onto a non-PSH affordable housing option when/if the program participant desires
    - Standard Lease Agreement
        - PSH projects must ensure that there is a standard lease agreement in place between the landlord/property manager and the program participant. The lease agreement cannot include reference to participation in supportive services or compliance with a treatment plan as a condition of ongoing tenancy
- Housing Focused Assistance
    - PSH projects' primary goal is to place program participants into permanent housing as quickly as possible, regardless of other personal issues or concerns. To that end, not only are supportive services voluntary, they are tailored to the client's needs as they pertain to obtaining and retaining permanent housing

Permanent Supportive Housing Centralized Waitlist
All Ohio BoSCoC PSH projects with common service areas (service areas identified in grant applications and agreements) must develop a single prioritized waiting list within that shared service area as well as policies and protocols for managing the waitlist and identifying program participants to be served. This waiting list must be aligned with the appropriate regional coordinated entry process, meaning that individuals and households placed on the waitlist have been identified and assessed via the coordinated entry process.

PSH service areas are defined by PSH grantees themselves and are generally identified within HUD and ODSA grant applications and grant agreements.

Implementation of and Compliance with Program Standards

All Ohio BoSCoC homeless programs required to comply with these standards, as outlined in the section regarding applicability of the standards, must update all relevant organizational, program, and regional documents to reflect compliance with these standards within twelve (12) months of the release of the standards. Furthermore, all impacted program elements, such as recordkeeping practices, must be updated to align with these standards within 12 months of their release. CoC staff will provide more detailed guidance about what items may need

updated and how to begin the process. Additionally, communities and providers may request assistance to help ensure compliance with the standards.

Once homeless programs are ready to implement updated documents, policies/procedures, and protocol in compliance with these Ohio BoSCoC Homeless Program Standards, they should take care to ensure that implementation only impacts new clients entering the project after adoption of updated policies. Clients who entered the project prior to the updating of program documents and policies should not be impacted negatively by those programmatic changes. For example, if a PSH project updates their prioritization policies in compliance with these standards, but still has current clients who likely wouldn't be prioritized for the PSH project under the new policies, those clients should be permitted to retain their housing. New clients applying to the PSH project after implementation of the updated prioritization policies will only be accepted into the project if they are prioritized according to the new policy. Updated policies should not be retroactively applied to current clients.

Beginning in 2017, CoC and/or grant management staff will begin reviewing updated program documents of federal and state funded homeless projects for compliance with these Ohio BoSCoC program standards as part of project evaluation and/or monitoring processes. Projects or organizations failing to comply may lose points in the CoC project evaluation process, or be required to develop a Quality Improvement Plan (see the *Ohio BoSCoC Quality Improvement Planning and Process* document) http://www.cohhio.org/files/pdf/BOSCOC%20QIP%20Process%20Plan%20FINAL.pdf). An ongoing failure to comply with these standards may result in loss of current state or federal funding or an inability to access public funds for future projects.