

# Homeless Program Standards

## Ohio Balance of State Continuum of Care

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## **Background and Introduction**

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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 Continuum 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.

### **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 Continuum 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<sup>1</sup>
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* definition. Further details regarding eligibility by program type are as follows:

- Homelessness Prevention
  - Can serve persons in Category 2 – Imminent Risk of Literal Homelessness
  - Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)
  - 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.
  - Category 4 – Fleeing/Attempting to Flee Domestic Violence (DV)

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<sup>1</sup> Ohio BoSCoC homeless projects are not permitted to serve anyone defined as homeless under category three of the federal definition.

- 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
  - Category 1 – Literally Homeless
    - SH projects are further limited to serving category 1 homeless who are residing in unsheltered locations only
  - Additionally, SH clients must have a severe and persistent mental illness and this must be documented appropriately
- Permanent Supportive Housing
  - Category 1 – Literally Homeless
  - 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
  - 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-notice/>.

### **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
  - 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:
  - Evidence that, at minimum, an annual assessment of service needs was completed (certain programs require more frequent assessment)
  - 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:
  - Income evaluation form (some programs require that specific forms be completed)
  - 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 personal 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://www.endhomelessness.org/pages/housing_first)
- [http://usich.gov/usich\\_resources/solutions/explore/housing\\_first](http://usich.gov/usich_resources/solutions/explore/housing_first)
- <http://www.desc.org/housingfirst.html>

## **Homelessness Prevention Projects 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:
  - Moved two or more times due to economic reasons in 60 days prior to application for assistance
  - Living in home of another due to economic hardship

- Losing housing within 21 days after application date
- Live in hotel/motel not paid for by charitable organizations or federal/state/local government programs
- Live in severely overcrowded unit as defined by the US Census Bureau
- Exiting publicly funded institution or system of care
- 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
  - 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
  - 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
  - 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
  - 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.
  - 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**

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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-notice>.

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**

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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**

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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.

In addition to reviewing these RRH Projects Standards, RRH projects should adhere to the more detailed Rapid Re-housing Projects Standards located in Appendix A.

### **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.

## **Safe Haven Projects Standards**

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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/BOSCOG%20QIP%20Process%20Plan%20FINAL.pdf)) <http://www.cohhio.org/files/pdf/BOSCOG%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.



# **Rapid Re-Housing Projects Standards**

**Ohio Balance of State Continuum of Care**

*Adopted: November 27, 2017*

# Background and Introduction

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The US 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 Continuum of Care (CoC) establish and consistently follow written standards for providing CoC and ESG assistance. The Ohio Balance of State Continuum of Care (BoSCoC) has developed these Rapid Re-housing Projects Standards to help 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 of our RRH projects across our homeless system.

## Definition of Rapid Re-Housing

Rapid Re-housing (RRH) is a short-term intervention to help individuals and families exit homelessness as quickly as possible, move into permanent housing, and achieve stability in housing. To be defined as RRH, a project must be comprised of the following three core components: housing identification assistance, financial assistance, and case management and supportive services.<sup>2</sup>

High quality RRH programs help increase the number of people communities are able to serve by reducing the length of shelter stays, which frees up crisis beds for others in need, reduces the negative impacts of long-term homelessness, and connects people to other community assistance to improve overall well-being and increase self-sufficiency.

## Applicability of RRH Program Standards

The RRH Program Standards outlined here apply to RRH projects operating within the Ohio BoSCoC that are funded through HUD's Continuum of Care (CoC) Program, HUD's Emergency Solutions Grant (ESG) Program, and the state of Ohio's Homeless Crisis Response Program (HCRP). Supportive Services for Veterans and their Families (SSVF) projects are not required to abide by these standards.

## Purpose of RRH Program Standards

The following sections outline detailed program standards and requirements for RRH projects operating within the Ohio BoSCoC. These program standards are intended to be used in conjunction with the Ohio BoSCoC Homeless Program Standards to guide overall program implementation. By providing these detailed RRH Program Standards, the Ohio BoSCoC is ensuring that the CoC meets federal requirements, uses best practices, and standardizes the overall provision of homeless assistance across the CoC.

CoC staff strived to write standards that apply to all RRH projects, regardless of funding source, but in some cases HCRP and CoC Program requirements differed enough that different standards were written. For more detailed information about all the differences between HCRP and CoC Program funded RRH requirements, review HUD's guide *Rapid Re-Housing Under the Emergency Solutions Grants Program versus the Continuum of Care Program*, available at [https://www.hudexchange.info/resources/documents/Rapid\\_Re-Housing\\_ESG\\_vs\\_CoC.pdf](https://www.hudexchange.info/resources/documents/Rapid_Re-Housing_ESG_vs_CoC.pdf), and refer to any available HCRP guidance provided by ODSA (as some HCRP requirements are more restrictive than ESG requirements).

## Organization of the RRH Standards

All required elements of the RRH core components are detailed in this document. As mentioned above, the core components represent the minimum areas of assistance that must be provided in order for a program to be considered a RRH program. However, these standards also articulate a number of practices, activities, and ways to provide RRH assistance within these core components that go beyond the minimum requirements - we call these ★RRH Gold Standards★, and these are clearly denoted wherever they appear.

Any practice/activity denoted as an ★RRH Gold Standards★ is not required for Ohio BoSCoC RRH projects at this time, but our hope is that RRH projects will identify those practices as something to strive for and implement in the future.

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<sup>2</sup> National Alliance to End Homelessness - <https://endhomelessness.org/rapid-re-housing-works/>

## Rapid Re-housing Standards

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Rapid Re-Housing (RRH) is a short-term intervention to help individuals and families exit homelessness as quickly as possible, move into permanent housing, and achieve stability in housing. To be defined as RRH, a project must be comprised of the following three core components: housing identification assistance, financial assistance, and case management and supportive services<sup>3</sup>. The core components, their associated activities, and related Ohio BoSCoC standards and requirements, are described in more detail in the following sections.

### A. Overarching Rapid Re-housing Standards and Requirements

#### RRH Eligibility

**STANDARD A.1:** RRH projects serve individuals and families who are literally homeless and lack the income and/or supports to end homelessness on their own

**REQUIREMENTS:**

- Literally homeless individuals/families
  - Literal homelessness is defined as homeless individuals/families who lack a fixed, regular, and adequate nighttime residence, meaning:
    - Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation, such a place not meant for human habitation
    - Living in emergency shelter or transitional housing designated to provide temporary living arrangements (including hotel/motel stays paid for by charitable or government programs)
    - 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
  - RRH projects funded through HUD's CoC Program are NOT permitted to serve individuals and families currently residing in Transitional Housing (TH) projects
  - RRH projects funded through the Homeless Crisis Response Program (HCRP) are permitted to serve individuals and families currently residing in TH, although these households should not be prioritized for assistance over otherwise prioritized households residing in emergency shelters or unsheltered locations.
- Lack of sufficient income and/or supports
  - To be eligible for RRH, individuals and families must have income no more than 50% of Area Median Income (AMI) at point of program entry
    - If income amounts cannot be verified at program entry, RRH projects may serve otherwise eligible and prioritized individuals and families, so long as the RRH provider believes they lack sufficient income and/or supports to obtain housing on their own
      - Self-declaration of income can be used to document/verify income when third party documentation cannot be obtained
  - To retain eligibility for RRH, client income MUST be verified no later than 90 days after program entry, and client income must be less than 30% AMI at that point
    - See later sections of this document that outline requirements to, at the very least, monitor income monthly
  - To be eligible for RRH, individuals and families must lack the financial resources and support networks needed to obtain housing on their own

**STANDARD A.2:** RRH projects accept referrals only through their Homeless Planning Region's Coordinated Entry (CE) system, and following the region's CE Policies and Procedures

**REQUIREMENTS:**

- RRH projects only serve individuals/families that have been assessed with the VI-SPDAT and are currently residing in a homeless location

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<sup>3</sup> "Rapid Re-Housing Performance Benchmarks and Program Standards", National Alliance to End Homelessness (February 2016). Available at: <https://endhomelessness.org/resource/rapid-re-housing-performance-benchmarks-and-program-standards/>

- As a reminder, individuals and families entering emergency shelter with no past history of homelessness will not be assessed for service needs until they have been in the shelter for at least 5 days, but no more than 8 days.

### **RRH Prioritization**

**STANDARD A.3:** RRH projects prioritize assistance for individuals and families with the greatest needs, who cannot otherwise be served by a more intensive resource.

#### **REQUIREMENTS:**

- Level of need is primarily determined by the results of the VI-SPDAT that is completed while individuals and families are in emergency shelter (or in an unsheltered location)
- In cases where the VI-SPDAT score indicates that an individual or family has a level of need that would likely best be addressed by Transitional Housing (TH) or Permanent Supportive Housing (PSH), but that resource is not immediately available, RRH providers should strive to serve these individuals or families with RRH assistance
- Returning RRH clients may be prioritized for assistance where possible, assuming they continue to be eligible (including that they are currently literally homeless)
- Eligible homeless Veterans who are not eligible for VA funded programs, such as the Supportive Services for Veterans and their Families (SSVF) program, are prioritized for RRH assistance if their VI-SPDAT score and housing barrier support the prioritization

### **Documentation and Record-keeping Requirements**

**STANDARD A.4:** RRH projects abide by all documentation and record-keeping requirements, including requirements for documenting homeless status and project eligibility.

#### **REQUIREMENTS:**

- To be eligible for RRH assistance, individuals and families must be residing in one of the following locations only:
  - A place not meant for human habitation, such as in a car, abandoned building, or outside
  - An emergency shelter meant to provide temporary living arrangements
  - Fleeing domestic violence or attempting to flee domestic violence
  - Exiting an institution such as a jail or hospital where they resided for no more than 90 days AND were residing in an emergency shelter or place not meant for human habitation immediately before entering the institution
  - A transitional housing (TH) project dedicated to serving homeless individuals or families (this applies to HCRP funded RRH only)
- RRH projects document homeless status for all RRH clients.
  - Acceptable documentation includes the following, in order of priority
    - *Third-party written verification* of homelessness (eg, HMIS record, documentation on letterhead from shelter or TH project)
    - *Third-party oral verification* from a case worker, outreach worker, or program staff
      - This can only be used as documentation after case workers have documented their due diligence in attempting to obtain third-party written verification of homeless status
    - *Self-certification* of homeless status
      - This can only be used as documentation if neither third-party written nor third-party oral verification could be obtained, and due diligence was documented

### **General RRH Program Requirements**

**STANDARD A.5:** RRH projects provide, as needed, rental assistance and other financial assistance to RRH clients

#### **REQUIREMENTS:**

- The following financial assistance can be provided by RRH projects:
  - Eligible in the HCRP funded Rental Assistance budget:
    - Rental assistance on behalf of RRH clients, up to a max of 24 months
    - Security deposits (up to 2 months of security deposits)
    - Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears)
    - Rental application fees
    - Moving costs
  - Eligible in the CoC Program funded Rental Assistance budget:



- Rental assistance on behalf of RRH clients, up to a max of 24 months
  - Security deposits (up to 2 months of security deposits)
  - Property damage
- Eligible in the CoC Program funded Supportive Services budget:
  - Moving costs
  - Utility deposits

**STANDARD A.6:** RRH projects provide rental assistance only for units that meet safety and cost standards  
**REQUIREMENTS:**

- Unit Inspections
  - HCRP funded RRH projects complete HUD Habitability Standards inspections on all housing units prior to providing rental assistance, and only provide rental assistance for units that have passed inspections
    - i. RRH projects must document this
  - CoC Program funded RRH projects complete Housing Quality Standards (HQS) inspections on all housing units prior to providing rental assistance, and only provide rental assistance for units that passed inspections
    - i. RRH staff conducting HQS inspections must successfully complete required training
    - ii. RRH projects must document this
- See the Housing Identification section below for more details
- Rental Payment Amounts
  - RRH assisted units must comply with HUD’s Rent Reasonableness Standards
    - i. RRH projects must document this
  - HCRP-funded RRH projects can pay no more in monthly rental assistance than the applicable Fair Market Rent (FMR)
  - CoC-funded RRH projects can pay no more in monthly rental assistance than the rent reasonable amount
- Lead-based Paint
  - RRH projects complete visual assessments for lead-based paint on all housing units built prior to 1978 that may house households with children under age 6, or with a pregnant person in the household
    - i. RRH projects must ensure any needed repairs are made, prior to providing rental assistance
    - ii. RRH staff conducting visual assessments must successfully complete required training
  - RRH projects provide all client households, regardless of whether or not children are in the home, with an Environmental Protection Agency (EPA) approved information pamphlet about identifying and controlling lead-based paint hazards, and collect a client signature indicating the information was received
    - i. Lead disclosure information can be found here: [https://www.hud.gov/program\\_offices/healthy\\_homes/enforcement/disclosure](https://www.hud.gov/program_offices/healthy_homes/enforcement/disclosure)

**STANDARD A.7:** RRH clients have standard lease agreements with landlords when monthly rental assistance is being provided on behalf of clients

**REQUIREMENTS:**

- HCRP funded RRH projects have no required minimum lease term
- CoC Program funded RRH projects are required to have leases between landlords and RRH clients for an initial term of one year
- Leases between landlords and RRH clients must abide by Ohio landlord/tenant law, and not include any additional requirements

**STANDARD A.8:** RRH projects utilize appropriate program forms and tools/documents to help ensure compliance with all federal and state requirements

**REQUIREMENTS:**

- RRH projects use program forms and tools/documents to help ensure compliance with program requirements
- Sample and standardized tools and forms are forthcoming, and may include the following:
  - Forms to help document RRH program eligibility including:
    - Homelessness documentation (follows HUD’s required order of priority for documentation source)

- Documentation of hh income
  - Documentation of lack of income and/or supports
- Intake form (that also meets HMIS data collection requirements)
  - This may need to include a signature page for clients to sign indicating that info is 'accurate to the best of my knowledge'
- Client Consent to Services
- Client Release of Information
- Client Agreement to the collection of data for HMIS
- Recertification Document (that also meets HMIS interim data collection requirements)
  - How can this be combined with other documents used monthly
- Client Exit Form (that also meets HMIS exit data collection requirements)
- RRH Participation Agreement
  - RRH Program Information
    - Purpose: provides an overview of the RRH program, and the project's written termination policy
  - Client Responsibilities
    - Purpose: provides information the responsibilities of an RRH client, including the consequences for not complying with program requirements such as the monthly case management meeting requirement
  - Client needs to sign this as well
- Documentation of Rent Reasonableness, Inspection, Lead-Based Paint
- Rent Calculation Tool
  - Used every month
  - Also provide space to calculate client's rent and providers rent contribution
  - Include some space for allowing for considering extenuating circumstance
- Copy of Lease
- Rental Assistance Agreement
- Housing Barrier Screening Tool (*standardized for the Ohio BoSCoC*)
  - Purpose: helps determine the barriers that may impede housing location and stability and provides foundational information for the creation of a Housing Stability Plan
- Housing Stability Plan (*standardized for the Ohio BoSCoC*)
  - Purpose: helps identify and track progress on goals related to obtaining and maintaining housing, can also help RRH program staff determine when RRH assistance can end
- Financial Assistance Tracker (*standardized for the Ohio BoSCoC*)
  - Purpose: tracks all the financial assistance an RRH client may need

**STANDARD A.9:** RRH projects enter into written Rental Assistance Agreements with landlords to which they will be making rental assistance payments

**REQUIREMENTS:**

- The agreement sets forth the terms under which rental assistance will be provided including the following:
  - Late payments
    - RRH projects must make timely payments to landlords in accordance with their Rental Assistance Agreement.
    - The Rental Assistance Agreement contains the same payment due date, grace period, and late payment penalty requirements as RRH client's lease
  - Notices to vacate or evictions
    - The Rental Assistance Agreement requires landlords to give RRH projects copies of any notice to the RRH client to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the RRH client
- The Rental Assistance Agreement indicates that the duration of rental assistance is individualized and re-assessed monthly, therefore no minimum amount of rental assistance is guaranteed

**Best Practices in RRH Projects**

**STANDARD A.10:** RRH projects fully adhere to a Housing First model

**REQUIREMENTS:**

- RRH projects are fully compliant with the Ohio BoSCoC Homeless Program Standards
- RRH projects adhere to housing first practices throughout the duration of assistance, including at program entry, after enrollment, and upon case closeout
- Acceptance into an RRH project cannot be denied for the following:

- Individual or family has zero income
- Individual or family refuses to accept services beyond the monthly case management requirement
- Individual or family is not currently sober
- Individual or family has a criminal history

*STANDARD A.11:* RRH projects follow harm reduction practices when working with individuals or families with substance abuse issues

**REQUIREMENTS:**

- If substance abuse concerns arise for an RRH client, RRH projects strive to connect them with substance abuse services
  - RRH client follow-through on those services is not required for ongoing RRH assistance
- RRH projects do not terminate RRH assistance for substance use alone
  - If RRH projects have evidence of RRH clients engaging in illegal behavior in an assisted unit, RRH assistance may be terminated if client is unwilling to stop the illegal behavior
- RRH projects may choose to hold units open for up to 90 days for RRH clients needing brief institutional stays, including in-patient substance abuse treatment

**RRH Program Staffing and Training**

*STANDARD A.12:* RRH projects are adequately staffed by qualified personnel to ensure quality service delivery and effective program management

**REQUIREMENTS:**

- RRH staff have appropriate knowledge of or experience working with individuals and/or families experiencing homelessness
- RRH projects maintain written job descriptions that address the major tasks to be performed by each position

*STANDARD A.13:* RRH projects provide standardized training on best practices to all new RRH staff

**REQUIREMENTS:**

- RRH projects ensure all new RRH program staff are trained within 6 months of their start date on the following best practices, at minimum:
  - Housing first practices
  - Harm reduction practices
  - Trauma-informed care
  - Progressive Engagement
- Completion of training is documented by RRH program management and kept on file
- RRH projects support program staff in engaging in continuing education activities on an annual basis

*STANDARD A.14:* RRH projects provide standardized training on program policies and procedures and practices to all new RRH staff

**REQUIREMENTS:**

- RRH projects ensure all new RRH program staff are trained within 1 month of their start date on the following:
  - RRH project policies and procedures
  - RRH program staff safety procedures
  - How to provide RRH case management
  - Landlord/tenant law
- RRH training for new program staff includes shadowing senior staff

*STANDARD A.15:* RRH projects maintain appropriate caseloads for RRH case management staff

**REQUIREMENTS:**

- RRH full-time case management staff charged with providing case management and services to RRH clients carry a caseload of no more than 35 households at any given time
  - When serving households with greater barriers or challenges, caseloads may need to be smaller
  - When services to some RRH clients are primarily provided by a partner agency, caseloads may be temporarily larger

*STANDARD A.16:* RRH projects ensure safety of program staff engaging in home-based case management

**REQUIREMENTS:**

- RRH projects adhere to all of the following practices to help ensure safety of staff:
  - RRH staff determine appropriateness of home visit, every time they visit
  - Prior to any home visit, RRH staff inform relevant staff/colleagues of the appointment including providing the address, scheduled length of the visit, and expected time of return to the office
  - As warranted, more than one RRH staff person may participate in home-based case management meetings with a client
    - This may be done in cases where concerns have arisen or where new staff are being trained
  - RRH staff record details of all home visits in a daily log that is accessible to all RRH program staff. Home visit log includes the following, at minimum:
    - Scheduled start and end time for home visit
    - Address of home visit
    - Scheduled time to leave and return to office
    - Name of all RRH staff attending the home visit
  - RRH staff call clients before leaving for the home visit and again upon arrival to determine if it might not be a safe time for a visit
  - All RRH staff doing home visits have cell phones with them at all times during work hours doing home visits
    - All RRH program staff share cell phone numbers so that all staff can contact each other as needed
    - Lack of access to a cell phone and/or cell phone service may necessarily limit home visits
  - RRH staff keep cell phones sufficiently charged, accessible, and operable at all times during work hours
- RRH projects post comprehensive, written home-based case management safety protocol where it can be seen by all staff doing home visits with RRH clients

## Rapid Re-housing Standards: Core Components

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RRH projects are defined by the following three core components:

- Housing Identification Assistance
- Financial Assistance
- Case Management and Services

The three core components, and their associated activities and related Ohio BoSCoC standards and requirements, are described in more detail in the following sections.

## RRH Core Component: Housing Identification

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### Overview

The RRH Housing identification core component is comprised of activities associated with working with landlords and/or property managers (referred to as landlords hereafter) to expand and retain RRH housing options, and activities associated with working with RRH clients to overcome housing barriers and identify housing options.

#### *Working with Landlords*

RRH projects engage in intentional and specific landlord recruitment activities to help ensure they have access to ample housing options that are accessible to RRH clients with significant housing barriers. RRH projects also provide support to landlords who are housing RRH clients to help ensure that landlord/tenant issues are addressed quickly and positively and in ways that help preserve access to quality housing options.

#### *Working with Clients*

RRH projects can provide support to clients by helping them identify housing units and develop plans to overcome the most critical housing barriers. RRH project also educate clients on the obligations of their lease agreement, as well as the elements of landlord/tenant law. RRH projects should also seek to have clients contact the project first if issues or concerns with the housing unit or landlord arise; then RRH project staff can work with clients to try to preserve the housing unit or develop a plan for moving into another unit while avoiding eviction.

## B. Housing Identification Standards and Requirements

The following section identifies the minimum policies and elements of RRH program design required within Ohio BoSCoC RRH projects for the Housing Identification core component. All of the following must be incorporated into RRH project's formal Policies and Procedures.

**STANDARD B.1:** RRH projects provide comprehensive Housing Identification services

**REQUIREMENTS:**

- RRH projects engage in all of the following Housing Identification services
  - Housing Options Recruitment and Support
    - Recruit landlords
      - Recruit landlords and who are willing to rent to program participants with housing barriers, including those who may fail typical tenant screening criteria.
    - Retain landlords
      - Support landlords working with RRH clients
        - Track landlord partners, vacancies, unit locations, characteristics, and costs
  - Housing Search and Support
    - Understand/identify tenant needs and housing barriers
    - Assist RRH clients in housing search

**STANDARD B.2:** RRH projects actively recruit landlords as a means to increase RRH housing options

**REQUIREMENTS:**

- RRH projects identify new landlords through various means, including reviewing local apartment listings and participating in local landlord networking events, among other activities
- RRH projects screen out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices

**STANDARD B.3:** RRH projects track housing units and landlords that can assist RRH clients. The document used for this tracking is called the "*RRH Housing Options List*"

**REQUIREMENTS:**

- RRH projects maintain a *RRH Housing Options List* that tracks local housing units and/or landlords that may be used to house RRH clients
  - RRH Housing Options Lists are available to all RRH program staff who assist with housing identification and landlord recruitment
  - RRH Housing Options Lists identify which landlords are willing to work with higher needs households, identifies any unique requirements, and any other important information
  - RRH Housing Options Lists are maintained in real time to the extent possible

**STANDARD B.4:** RRH projects provide support to landlords as a means to ensure ongoing partnerships

**REQUIREMENTS:**

- RRH must provide the following services to landlords housing RRH clients with an open case (ie, current RRH clients):
  - Respond within one business day to landlord calls about serious tenancy issues
  - Seek to help resolve conflicts around lease requirements
  - When housing units cannot be retained, try to negotiate move-out terms and assist RRH clients to move into other units without an eviction
- If financially feasible, RRH projects develop an Incentive Pool to help attract and retain landlords. An Incentive Pool may provide funding to help with the following:
  - Extreme damage to units
  - Additional security deposits
  - Rent in excess of the local Fair Market Rent (FMR) or rent reasonableness standard (in high cost, tight rental markets only)
    - HCRP-funded RRH projects can never make rent payments that exceed FMR unless they are using non-HCRP funds to cover the difference
  - See the ★*RRH Gold Standard*★ for more information about how incentive pools can be utilized
- RRH projects have written materials for landlords that outline the benefits to working with the RRH project and specify the services that RRH projects can provide. These materials must include the following:

- Description of the tenancy supports provided to RRH clients, including the use of regular home visits
- Description of services that can be provided to the landlord by the RRH project

★RRH Gold Standard★

Housing Locators for Dedicated Landlord Recruitment and Support

Identification of sufficient housing options via partnerships with local landlords is critical to ensuring quick access to housing for RRH clients. Many RRH projects find greatest success recruiting and retaining landlords when they have staff dedicated to this work – these staff are often called *Housing Locators*. By investing in specialized Housing Locators, RRH projects are able to build their organizational capacity and expertise to identify and recruit new landlords, provide needed support in order to retain landlords, and build out a broader range of housing options for clients. In turn, this allows RRH services staff to focus on helping clients overcome housing barriers, create and act on Housing Stability Plans, and ultimately stabilize in independent housing.



**STANDARD B.5:** RRH projects assess client level of need and housing barriers in order to help identify housing and develop plans for overcoming barriers

**REQUIREMENTS:**

- RRH projects use results of most recently completed VI-SPDAT assessment to determine initial level of need
- RRH projects work with clients to identify housing barriers not identified by the VI-SPDAT
- RRH projects work with clients to develop plans to overcome most critical housing barriers

**STANDARD B.6:** RRH projects assist RRH clients to identify appropriate housing options

**REQUIREMENTS:**

- RRH projects must offer the following assistance, at minimum, to help with housing identification:
  - In collaboration with RRH clients, offer to help identify rental units and contact landlords on client's behalf, if needed
  - As needed, accompany clients in efforts to identify possible housing options
    - Where resources are available, provide transportation assistance to clients to aid in housing options search, if needed
  - Using the project's RRH Housing Options List, review current local housing options and share with client any potential options

**STANDARD B.7:** RRH projects provide RRH assistance only to rental units that are habitable

**REQUIREMENTS:**

- RRH project completes HUD Habitability Standards inspections on all housing units prior to providing rental assistance
  - CoC Program funded RRH projects must conduct Housing Quality Standards (HQS) inspections on all RRH assisted units

★RRH Gold Standard★

Unit Inspections

HCRP-funded RRH projects are only required to conduct HUD Habitability Standards (HS) inspections on units they intend to assist with RRH, while CoC Program-funded RRH projects must conduct Housing Quality Standards (HQS) inspections, which is a higher standard. Although an HQS inspection is more difficult to pass, RRH should consider moving towards conducting all HQS inspections. In cases where an RRH client may need to later access PSH resources or the local Housing Choice Voucher program, that client may be able to retain their current unit if it can pass HQS. If the unit was already inspected using HQS, then it highly likely it will pass again and the client will not need to make another move.



**STANDARD B.8:** RRH projects dedicate sufficient staff time to landlord recruitment, engagement, and retention activities, and these activities are incorporated into overall project implementation

**REQUIREMENTS:**

- Develop written process that guides overall project efforts to recruit, engage, and retain landlords
  - Review this process on a regular basis and update as needed
- There are two primary ways RRH projects can staff landlord recruitment and support activities. RRH projects may do one of the following:
  - Designate staff whose job, in part or in whole, is to identify housing options and landlords, and provide support in order to retain those housing options and landlords
  - Designate specific RRH case managers' duties associated with housing options recruitment and support activities.

## RRH Core Component: Financial Assistance

### Overview

The RRH Financial Assistance core component is comprised of activities associated with determining the amount and duration of rental assistance and other financial assistance that is provided to RRH clients, and the activities associated with making payments for rent, utilities, and move-in assistance.

As a part of the planning process, move-in assistance includes providing clients with resources and supplies before they move from shelter into housing. This can include RRH eligible costs such as moving truck rental or hiring a moving company, as well as assistance provided by other community partners such as furniture, food, and toiletries.

There are two key principles, grounded in the housing first philosophy, that guide the provision of financial assistance in RRH projects:

- Rent and move-in assistance needs to be flexible and matched to the needs of the client in order to move clients into permanent housing as quickly as possible.
- In order to serve the largest number of homeless clients possible, RRH projects should provide the least amount of assistance possible to stabilize people in permanent housing quickly.

### C. Financial Assistance Standards and Requirements

The following section identifies the minimum policies and elements of RRH program design required within Ohio BoSCoC RRH projects for the Financial Assistance RRH core component. All of the following must be incorporated into RRH project's formal Policies and Procedures.

**STANDARD C.1:** RRH projects provide comprehensive Financial Assistance services

**REQUIREMENTS:**

- RRH projects engage in all of the following Financial Assistance services:
  - Determine Rental Assistance
    - includes determining the amount and duration of rental assistance
  - Determine Move-in Assistance
    - include determining the type and amount of move-in assistance
      - security deposits, first/last month's rent, additional assistance
  - Making Payment to Landlords
    - includes providing payments directly to the landlord for rental assistance, utilities, and any other move-in related costs, as needed, and as cost effectively as possible

**STANDARD C.2:** RRH projects provide move-in assistance that is tailored to individual need  
**REQUIREMENTS:**

- In determining the type and amount of move-in assistance to provide, RRH projects must do the following at program entry:
  - Assess program applicant's need (including VI-SPDAT score and income information) to determine the financial assistance needed for move-in
    - this includes determining if utilities deposits are needed, how much security deposit may be needed, if moving truck rental assistance is needed, if the Incentive Pool needs utilized, etc

**STANDARD C.3:** RRH projects provide an amount of rental assistance that is tailored to individual need.  
**REQUIREMENTS:**

- In determining the amount of rental assistance to provide, RRH projects must do the following:
  - On a monthly basis, assess program applicant's need (including housing stability score and income information) to determine the rental assistance amount to be provided by the RRH project in the subsequent month
  - If client has income, RRH projects seek to require a tenant rent contribution whenever possible (see following standard for details about tenant rent contribution requirements)
    - If income amounts cannot be verified at program entry, RRH projects may serve otherwise eligible and prioritized individuals and families, so long as the RRH provider believes they lack sufficient income and/or supports to obtain housing on their own
      - Self-declaration of income can be used to document/verify income when third party documentation cannot be obtained
      - Subsequent month's rental assistance is determined based on individual client need, including income

**STANDARD C.4:** RRH clients who have income and are able to contribute towards rent, pay a contribution towards their rent whenever possible  
**REQUIREMENTS:**

- Before calculating RRH client rent contribution, RRH projects must determine that the client BOTH has income AND that his/her financial obligations allow for contribution towards rent
  - For example, Client X has income but also needs to pay for repairs to keep their car operable, as they rely on their car for transportation to/from work. In this case, it may be appropriate NOT to require a tenant rent contribution for this particular month in order to allow the client to pay for needed car repairs that contribute to employment and income sustainability.
- Where RRH projects have determined that clients have BOTH income AND the ability to pay a contribution towards rent, client tenant rent contribution is determined in the following way:
  - Clients with income below 30% AMI
    - RRH clients contribute at least 30% of the household's monthly adjusted income towards rent
  - Clients with income above 30% AMI
    - RRH clients contribute at least 50% of the household's monthly adjusted income towards rent
    - Clients above 30% AMI are not eligible for ongoing RRH assistance after 90 days
  - RRH client contribution is determined in accordance with section 3(a)(1) of the US Housing Act of 1937 (42 U.S.C. 1437a(a)(1)). Details can be found here: <https://www.gpo.gov/fdsys/search/pagedetails.action?packageId=USCODE-2010-title42&granuleId=USCODE-2010-title42-chap8-subchapl-sec1437a>



- RRH client income must be calculated in accordance with 24 CFR 5.609 and 24 CFR 5.611(a). Details can be found here: <https://www.gpo.gov/fdsys/granule/CFR-2011-title24-vol1/CFR-2011-title24-vol1-sec5-609>
- If an RRH client has no income, then no rent contribution is required
  - This must be documented
- In general, RRH projects should strive to increase client rent contribution over time whenever possible, in order to help prepare clients to fully manage rental costs once the RRH financial assistance ends

**STANDARD C.5:** RRH projects provide rental assistance for a duration of time that is tailored to individual need  
**REQUIREMENTS:**

- In determining the duration of rental assistance to provide, RRH projects must do the following:
  - On a monthly basis, assess client's financial need (including using Housing Stability score and income information) to determine if additional rental assistance should be provided by the RRH project
  - RRH projects may provide no more than 24 months of rental assistance to any one client
    - i. 24 months of assistance, over a three year period, is the absolute maximum amount of assistance that may be provided to any RRH client, but should only be provided in very rare cases, if at all
    - ii. If serving a RRH client with more than 12 months rental assistance, RRH program staff need to do and document the following, at minimum:
      1. Require twice monthly meetings with RRH client for purposes of creating and monitoring progress on plans to gain or increase income and/or benefits (ie, the Housing Stability Plan)
      2. On a monthly basis, assess RRH client for ongoing need for assistance
      3. Recertify and document program eligibility every 90 days
    - iii. Information about the RRH program should not indicate that any particular amount or duration of financial assistance is guaranteed

## **RRH Core Component: Case Management and Services**

The RRH Case Management and Services core component is comprised of providing individualized case management to RRH clients in order to help them obtain and move into housing, stabilize in housing, and determine when the RRH assistance can be terminated. Effective case management involves a blend of assessment and coordination services provided throughout the client's time in the project, and tailored to client needs as they pertain to retaining permanent housing.

### **D. Case Management and Services Standards and Requirements**

The following section identifies the minimum policies and elements of RRH program design required within Ohio BoSCoC RRH projects for the Case Management and Services RRH core component. All of the following must be incorporated into RRH project's formal Policies and Procedures.

**STANDARD D.1:** RRH projects provide comprehensive case management and services  
**REQUIREMENTS:**

- RRH projects engage in all of the following case management and services activities:
  - Services to help obtain and move into housing
    - Assess and understand tenant needs and housing barriers, and help resolve barriers
    - Provide support to RRH clients as they look for housing units and assist in housing search as needed
  - Services to help stabilize in housing
    - Help resolve any tenancy issues that may arise
    - Help clients understand their responsibilities within a lease
    - Connect clients to mainstream resources and employment
  - Close out the case
    - Assess client need to ensure there is no longer imminent risk of homelessness
    - Ensure clients know they can contact RRH again if needed
      - Financial assistance may only be provided if client becomes homeless again (or if the case has not yet been closed)

*STANDARD D.2:* RRH projects understand the housing barriers of their RRH clients and develop plans to address barriers

*REQUIREMENTS:*

- RRH projects conduct housing barrier assessments in order to understand potential challenges in finding housing for RRH clients
  - Knowledge of housing barriers is never used to screen out potential RRH clients. It is only used to inform identification of housing options and the development of housing plans

*STANDARD D.3:* RRH projects work with clients to address housing barriers

*REQUIREMENTS:*

- RRH staff develop housing plans collaboratively with RRH clients
- RRH staff work with clients, using strengths-based approaches, to resolve housing barriers in order to make more housing options available
- RRH projects must offer the following assistance, at minimum, to help identify possible housing units:
  - In collaboration with RRH clients, help identify rental units and contact landlords/property managers on client's behalf as needed
  - Using the project's housing unit tracking information, review current local housing options and share with client any potential options

*STANDARD D.4:* When possible, RRH projects provide case management services in the client's home.

*REQUIREMENTS:*

- RRH case management staff strive to meet with every client in their home at least once during the time they are being assisted by the RRH project
- Where RRH projects are unable to provide in-home case management services for all clients, RRH projects prioritize home visits for clients with higher needs or potential need for longer term RRH assistance
- RRH projects have policies and procedures that address staff safety while doing home-based case management
  - Please refer to the Program Staffing and Training section of this document for more details related to minimum staff training and safety planning

*STANDARD D.5:* RRH clients are required to meet with case management staff at least monthly

*REQUIREMENTS:*

- RRH projects must require clients to meet with program staff monthly for an RRH Case Management meeting. In these meetings, RRH program staff and clients address all of the following:
  - Determine if ongoing financial assistance is needed
    - Review monthly budget for changes
    - Review progress of gaining or increasing income
    - Review progress on Housing Stability Plan (see the following standards for more information about what Housing Stability Plans should include)
  - Calculate the amount of financial assistance to be provided in the next month
    - Ensure clients continue to be income eligible for ongoing assistance
      - Income re-certification must happen no later than 90 days after enrollment into the RRH project; it does not have to happen sooner.
  - Ensure clients are still residing in the assisted housing unit

*STANDARD D.6:* Other than the required monthly RRH Case Management meeting, RRH clients participate in supportive services on a voluntary basis.

*REQUIREMENTS:*

- RRH assistance may not be terminated for a client's failure to participate in services beyond the monthly case management meeting requirement

★RRH Gold Standard★

Monthly In-Home Case Management

Conducting monthly, in-home case management meetings with all RRH clients is the best practice in RRH service provision. In-home case management meetings offer many benefits to both RRH providers and clients. For example, being in clients' homes allows RRH staff to observe first-hand how the household is stabilizing in their housing. These in-home meetings may also help RRH staff to learn about and thus be able to address potential tenancy issues. Lastly, for RRH clients with limited access to transportation or other barriers, in-home case management meetings may simply be easier for them to comply with than office visits.



**STANDARD D.7:** RRH projects must develop, in collaboration with clients, individualized Housing Stability Plans.

**REQUIREMENTS:** These Housing Stability Plans must address the following:

- Actions and timelines for clients to seek non-cash benefits, cash income, and connection to other mainstream resources, as determined collaboratively by the client and program staff
- Actions and timelines for clients to address other housing-related goals/needs, as identified by the client

**STANDARD D.8:** RRH program staff help connect clients to mainstream resources and community supports

**REQUIREMENTS:**

- RRH projects use the Housing Stability Plan to identify what benefits and supports are needed and desired by the client, and help client develop a strategy and plan for accessing those benefits and supports. Examples of common benefits/services used by RRH clients include, but are not limited to:
  - Food pantries and food support programs
  - Job training programs
  - Child care services
  - Health insurance/Medicaid
  - Utility assistance
  - Clothing assistance
  - Social Security
  - Employment training programs
- RRH projects provide assistance to clients as they seek to access resources and supports by doing the following, or linking to other community agencies that can do the following:
  - Help complete applications for non-cash benefits
  - Provide transportation assistance to get to appointments
  - Assist with the preparation of resumes and/or practicing interview skills

**STANDARD D.9:** RRH projects respond to and try to help resolve tenancy issues if they arise.

**REQUIREMENTS:**

- Responding to tenancy issues may include the following:
  - Mediating between landlord and client to retain current housing
  - When retaining current housing is not an option, RRH staff work with landlord to negotiate client's move out in a way that avoids eviction

### **Case Closeout and Termination of Assistance**

Successful RRH case closeout involves ending rental assistance and services after RRH staff have determined that the client is no longer at imminent risk of homelessness, as evidenced by some connection to mainstream resources, employment, and/or other supports. Planning for case closeout should begin within 30 days of program entry so that staff and clients have sufficient time to prepare closeout and to ensure the eventuality of case closeout is clearly communicated to clients from the very beginning.

RRH programs may terminate assistance for violations of program requirements or conditions of occupancy. However, RRH projects seek to avoid negative terminations whenever possible and, where they do occur, they do not necessarily prohibit an individual or family from accessing RRH assistance in the future.

*STANDARD D.10:* RRH projects may close out RRH cases and terminate financial assistance once staff have determined the client is no longer at imminent risk of homelessness

**REQUIREMENTS:**

- RRH staff consider the following when determining if RRH assistance can end and the case can be closed out:
  - RRH client progress on Housing Stability Plan
  - RRH client has gained or increased employment or cash income
  - RRH client has gained or increased non-cash benefits or other mainstream resources
  - RRH client has gained or accessed other supports, such as connecting with family support systems, for example
  - Ratio of income to rent/living costs
  - Housing in good standing (client is able to pay rent and follow lease conditions)
- RRH staff inform clients of pending case closeout and termination of financial assistance at least 30 days before assistance ends
  - Communication must be made in writing, at minimum
- RRH staff inform landlords of pending termination of financial assistance at least 30 days before assistance ends

*STANDARD D.11:* RRH projects make multiple attempts to contact/locate RRH clients who have become non-responsive to staff

**REQUIREMENTS:**

- RRH program staff make every reasonable attempt to locate clients, including the following, at minimum:
  - Make at least three attempts to contact the client by phone, mail, email, and/or home visit
  - Where there is a release, contact other organizations working with the client to see if they have information about the client's whereabouts (only if appropriate and necessary)
  - Where there is a release, contact the landlord to see if they have information about client whereabouts
    - Contacting landlords should be done with care, and only as a last resort when other attempts to contact the client have been unsuccessful
- All efforts to locate a client must be documented in the client's file
- If there is no contact after 30 days of multiple attempts to reach the client, RRH staff exit the client from the program.
  - Written communication of program termination is sent to client explaining the reason for and date of termination
  - Written communication of program termination and termination of financial assistance is sent to the landlord at least 30 days prior to the end of RRH assistance
  - The RRH project's written termination policy (see more details below) is adhered to
- If household contacts the RRH project after the termination date and is still experiencing homelessness, RRH staff connect them with local homeless resources so they can be re-assessed and screened for RRH eligibility and prioritization
- Future RRH assistance cannot be denied solely for a client's past non-responsiveness.

*STANDARD D.12:* RRH projects make multiple attempts to engage RRH clients who are not making progress on Housing Stability Plans

**REQUIREMENTS:**

- RRH program staff make every reasonable attempt to re-engage clients and re-evaluate Housing Stability Plans, including the following at minimum:
  - During required RRH Case Management meetings, RRH program staff and clients collaboratively review progress on the Housing Stability Plan and identify any areas of the plan that need revision
  - After revisions to a Housing Stability Plan have been made, RRH program staff allow at least one to two weeks for clients to make progress on the revised plan
- If RRH clients continue to not make progress on revised Housing Stability Plan, RRH program staff may begin process to exit the client from the program

- Written communication of program termination is sent to client explaining the reason for and date of termination
- Written communication of program termination and termination of financial assistance is sent to the landlord at least 30 days prior to the end of RRH assistance
- The RRH project's written termination policy (see more details below) is adhered to
- If household contacts the RRH project after the termination date and is still experiencing homelessness, RRH staff connect them with local homeless resources so they can be re-assessed and screened for RRH eligibility and prioritization
- Future RRH assistance cannot be denied solely for a client's past failure to make progress on a Housing Stability Plan

*STANDARD D.13:* RRH projects follow a formal written process when involuntarily terminating RRH assistance for a client

**REQUIREMENTS:**

- RRH projects' termination policy/process must consist of the following, at minimum:
  - Provide RRH clients with a written copy of the program rules and the termination process before providing assistance
  - When seeking to proceed with termination of assistance, provide written notice to the client containing a clear statement of reasons for termination
  - Provide clients the opportunity to present written or oral objections to the recommended termination before a person other than the staff person (or a subordinate of that person) who initially made or approved the termination decision
    - Examples of staff positions that could be designated to review appeals of termination decisions include:
      - Human Resources staff
      - In organizations with multiple program areas, staff from a program other than the RRH program
      - RRH Project Director or Manager
  - Within 72 hours of review of client objections to termination, provide written notice of the final decision to the client, including providing information on any appeals process and/or next available steps.

## Data Collection, Monitoring, and Reporting

Collecting, reporting, and monitoring client-level and project-level data is critical to overall evaluation of the impact of homeless assistance projects, including RRH projects. To that end the Ohio BoSCoC requires all homeless projects to enter data into the CoC's Homeless Management Information System (HMIS). The Ohio BoSCoC HMIS is used to collect data on demographic and disability information, income and living situation details before RRH, and destination upon exit from the local RRH program.

The Ohio BoSCoC also monitors overall performance of homeless assistance projects, including RRH, as well as the performance of the system as a whole, with a focus on reducing and ending homelessness.

### E. Data Collection, Monitoring, and Reporting Standards and Requirements

The following section identifies the minimum policies and elements of program design required within Ohio BoSCoC RRH projects for this component. All of the following must be incorporated into RRH project's formal Policies and Procedures.

#### HMIS Participation and Managing Data Quality

*STANDARD E.1:* RRH projects enter client-level data into the Ohio BoSCoC HMIS

**REQUIREMENTS:**

- RRH projects abide by the Ohio BoSCoC HMIS Policies and Procedures
  - Can be found at: <http://hmis.cohhio.org/index.php?pg=kb.page&id=38>
- RRH projects comply with the Ohio BoSCoC HMIS Data Quality Standards
  - Can be found at: <http://hmis.cohhio.org/index.php?pg=kb.page&id=39>
- The only providers exempted from this requirement are victim-services agencies

*STANDARD E.2:* RRH projects ensure their HMIS data is accurate

*REQUIREMENTS:*

- RRH projects comply with the Ohio BoSCoC HMIS Data Quality Standards
- RRH projects monitor their own data quality, as described in the HMIS Data Quality Standards

*STANDARD E.3:* RRH projects accurately report in HMIS the entry dates and residential move-in dates for RRH clients

*REQUIREMENTS:*

- HMIS: RRH Program Entry Date
  - The RRH program entry date is the date on which the individual/family consents to participate in services and the RRH program agrees to provide services.
    - The RRH program entry date is NOT the date that housing is located
- HMIS: RRH Program Residential Move-in Date
  - The RRH residential move-in date is the date on which the RRH client moves in to the RRH assisted rental unit

**Monitoring RRH Project-Level Data**

*STANDARD E.4:* RRH projects monitor their performance on a regular basis

*REQUIREMENTS:*

- On a quarterly basis at minimum, RRH projects review their project-level data on the Ohio BoSCoC Quarterly Performance Report and develop and enact plans to improve project performance as needed
  - Ohio BoSCoC QPRs can be found here: <http://cohhio.org/member-services-2/boscoc/performance-and-monitoring/>