

Webinar Information



All participants lines are muted.



Use the questions feature in the GoToWebinar control panel to submit questions.



This webinar will be posted to COHHIO's website.



This webinar is being recorded.

2

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Agenda

- Overview & Purpose of Program Monitoring
- Outline of Monitoring Activities
- Common Findings
 - Policies & Procedures
 - HQS Inspections
 - Rent Reasonableness
 - Client Eligibility



- Disability Definition & Documentation
- Resources & Questions

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

3

3

Agenda

- Overview & Purpose of Program Monitoring
- Outline of Monitoring Activities
- Common Findings
 - Policies & Procedures
 - HQS Inspections
 - Rent Reasonableness
 - Client Eligibility
- Chronic Homeless Definition & Documentation
- Disability Definition & Documentation
- Resources & Questions

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

4



Overview of Monitoring

Why?

- > Required in CoC Program Interim Rule
- HUD field office requesting that we provide more technical assistance and monitoring

What & Where?

- Only monitoring projects funded by HUD's CoC Program
- Monitoring will consist of a review of APRs, HMIS Client Files, Client File Review (via Clarity), CoC Application, and Agency Policy and Procedures
- Monitoring is being done virtually

5

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

5

Overview of Monitoring

Who?

Ohio BoSCoC Coordinator will reach out to program leadership to schedule virtual visits

When?

- ➢ Visits have been on-going since February 2019
 ➢ No visits were done in 2020 due to the pandemic
- The monitoring score you receive will determine how often visits will occur after that

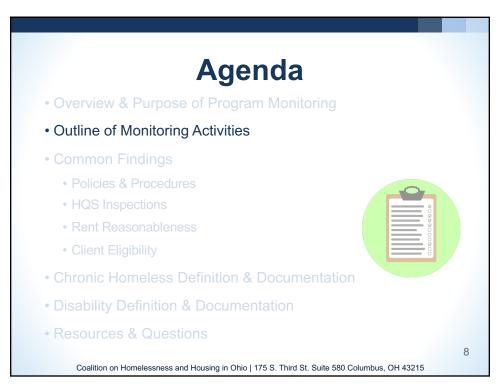


Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

6









Outline of Monitoring Activities

- Client File Review Agency staff will review four client files
 - Relevant files will then be uploaded by program staff to the client's file in Clarity via the "Files" tab
 - Review will be done privately and confidentially



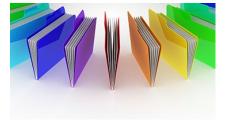
Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

9

9

Outline of Monitoring Activities

3. HMIS Client Records – Agency contact person will provide *four* client IDs for CoC Coordinator to review



10

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Outline of Monitoring Activities

2. Annual
Progress/Performance
Reports – CoC
Coordinator will run
and review (nothing
needs to be done by
program staff)

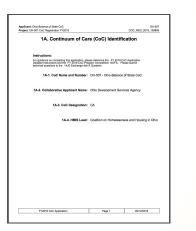
Consideration for Section 1997 (Section 1997) (Sect			ERFORMANCE REPOR COC APR in Sag				
Minimum of the control of the contro					Consists	nt with Data Standards V	
See Note that the member of the seed of th	1. Grant Information						
Contract of the Date of the Contract of the Co	MR information						
Georgia de la de 1811. Ten de la companya del companya de la companya de la companya del companya de la companya del la co	CoC + Not HWIS; Sage + I						
Note 1 Section from an one to Bounce of CV and one proceeded 2 Note 1 Section from 1 Section fr							
- An act of an of define are performed. - An act of an of define are performed. - An act of an of a define are performed. - An act of a define are performed as a response of a definition					-Prepapula	ted	
A thin with the part is a country to the part of the p					-select		
The country of the co							
Ship and Marie An and Anna Anna Anna Anna Anna Anna An			roved grant extension?				
A thin for a 200°							
"If his has no section of the law 19050" solution of the law 19050" solutio		repersing emigation associ	resen war a use requireme	907			
- "The house control properly		ated on a final date in LC	cost				
section a selection part of military and the control of the contro			W.F.				
The threat fermionism of the characterism of							
Section and the processor of the process							
The Ball and Annie of the Committee and Comm							
** Apr. valid ** under ** unde					- otens		
The designation of the control of th							
"An average production of the control of the contro		: Does your project have a	specific population facus?				
And An an investment and official investment of the investment of	- Fives, which populatio	e?			-select-		
All And A with investments or tollutation against fairer and in American State of the A		in HMIS or where applicab	se?	-select-			
Western before 1 to American For Section 1 to A	-if eq. why?						
International Column	otal Number of Year Re CoC - Not HMS; Sign - I	and Beds/Units from App	dication		-Prepapule	tec-	
Test Nan-Gericologo Ci Este Company Ci Este Co							
Market Red and LOO QUILLOON Nation lateral Actual Inventory URBasidan Rate - UNI	Total Dedicated OH B	s -hrepapulated-					
Politico (Time Uniform to the Control of Con	Total Non-Dedicated	CH Reds			-Prepapula	teć	
Total Urbit	III Actual Bed and Unit	Utilization					
April N N N				Utilization I	late - Unit	Utilization Rate - Bed	
N N	Utilization on the Last Wednesday of			N.		N	
	Utilization on the Last Wednesday of the Month						
Ottober N N	Utilization on the Last Wednesday of the Month						
	Utilization on the Last Wednesday of the Month January April July						
	Utilization on the Last Wednesday of the Month January April July						

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

11

Outline of Monitoring Activities

4. CoC Applications – CoC Coordinator will review most recent CoC Application to look for things like match commitment, estimated # of clients program expects to serve, and general program information



12

11

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Outline of Monitoring Activities

5. Agency Policies and Procedures – CoC Coordinator will review Policies and Procedures documents



Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

13

14

13

Agenda

- Overview & Purpose of Program Monitoring
- Outline of Monitoring Activities
- Common Findings
 - Policies & Procedures
 - HQS Inspections
 - Rent Reasonableness
 - · Client Eligibility
- Chronic Homeless Definition & Documentation
- Disability Definition & Documentation

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Policies & Procedures:

- · Policies & Procedures document should be specific to the CoC funded project
- Should cover such things as
 - **Housing First**
 - Program Eligibility and documentation
 - Coordinated Entry/Prioritization and documentation
 - Fair housing
 - Non-discrimination
 - **Emergency Transfer Plan**
 - Client confidentiality
 - Allowing for, and should be actively seeking, people with lived expertise to sit on board/decision making body
 - Rent Reasonableness
 - **Grievance and Termination Policy**

15

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

15

Common Findings

Policies & Procedures:

- Should cover such things as (cont.):
 - Day to day operations/staff rules & regulations
 - Intake procedures
 - Order of priority
 - Overview of case management services
 - Documentation of case management services
 - Annual assessments
 - Income calculation and rent determination
 - HMIS related policies
 - Conflict of interest
 - Housing search, selection, HQS inspection Client program rules
- Policies and Procedures should be cover all aspects of program
 - If you handed a new employee the Policies & Procedures, could they understand how to successfully do their job and understand all other functions of the agency?

16

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



APR Submission:

- APR's are due in the Sage reporting system no later than 90 days after grant end date
- APR's must be submitted on time for full points
- It is crucial to submit the APR AND any necessary corrections made in a timely manner



Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

17

Common Findings

Housing Quality Standard (HQS) Inspections:

- All CoC funded projects must complete initial and annual HQS inspections on all units
- Inspections can be done by housing provider, so long as the units are not owned by the housing provider
 - If units are owned by housing provider, a third-party must conduct HQS inspection of unit to avoid conflict of interest



18

17

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Rent Reasonableness:

- Rents must be reasonable based on comparable units in the community and may not exceed rents currently being charged by the same owner for comparable unassisted space
 - Units with rental assistance funds can exceed FMR, so long as program stays within budget and can still serve the # of households identified in their grant agreement
 - Units assisted with leasing funds cannot exceed FMR
- Compare potential unit rent to 3 other similar units
- Sample Rent Reasonable Checklist can be accessed here: https://cohhio.org/boscoc/training-and-templates/

19

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

19

Common Findings

RRH Eligibility:

- Must document that client was homeless prior to entry
 - HMIS shelter project entry or letter from third party verifying where, when, and how long client was staying in literally homeless location
 - If using HMIS to document homeless history, there must be a record that shows shelter entry/exit
 - A data element asking about homeless history with no documentation/verification would **not** suffice
- Must be evidence that client went through Coordinated Entry
 - · VI-SPDAT, notes from prioritization meeting, etc

20

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



PSH Eligibility:

- Must document that client was chronically homeless prior to entry
 - HMIS shelter project entry or letter from third party verifying where, when, and how long client was staying in literally homeless location
 - If using HMIS to document homeless history, there must be a record that shows entry/exit
 - A data element asking about homeless history with no documentation/verification would not suffice
 - If client was not chronically homeless, there should be written documentation as to how it was determined there was no one chronically homeless to provide unit to
- Must document disability
 - Documentation must be signed by a professional qualified to diagnose disability
 - LISW, MD, PCC, Ph. D, etc
- Must be evidence that client went through Coordinated Entry
 - · VI-SPDAT, notes from prioritization meeting, etc

21

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

21

Common Findings

TH Eligibility:

- No TH projects have been monitored yet
- Must document that client was homeless prior to entry
 - HMIS shelter project entry or letter from third party verifying where, when, and how long client was staying in literally homeless location
- Must be evidence that client went through Coordinated Entry
- Client must have been assessed as not being able to quickly resolve their homelessness on their own, but who does not have needs great enough to necessitate placement in to PSH

22

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Residence Prior Eligibility (all project types):

Likely Eligible:

- Emergency Shelter
- Unsheltered
- Treatment Center (for 90 days or less)
- Transitional Housing (TH)
 –should be last prioritized



Likely Not Eligible:

- Rental Housing
- Interim Housing
- Living with Family
- Residential Project/Halfway House



Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

23

Agenda

- Overview & Purpose of Program Monitoring
- Outline of Monitoring Activities
- Common Findings
 - Policies & Procedures
 - HQS Inspections
 - Rent Reasonableness
 - Client Eligibility



- Disability Definition & Documentation
- Resources & Questions

24

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



Chronic Homeless Definition & Documentation

- All Ohio BoSCoC PSH projects must serve persons who meet category 1 of HUD's homeless definition AND are diagnosed with a disability.
 - Category 1 "Literally homeless", meaning individuals/families who lack a fixed, regular, and adequate nighttime residence
- Agencies cannot preference one disability over another
- All PSH projects must prioritize chronically homeless individuals

25

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

25

Chronic Homeless Definition & Documentation

- HUD's chronic homeless definition:
 - A person experiencing homelessness with a disability that
 - 1. Lives in a place not meant for human habitation, safe haven, or in an emergency shelter

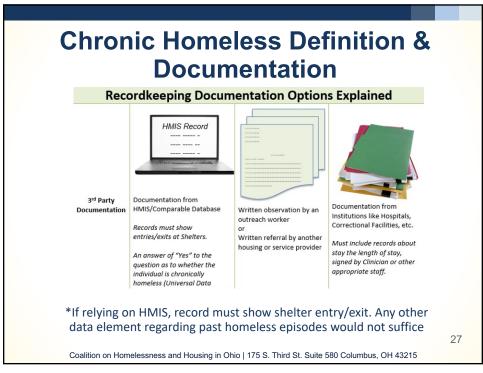
AND

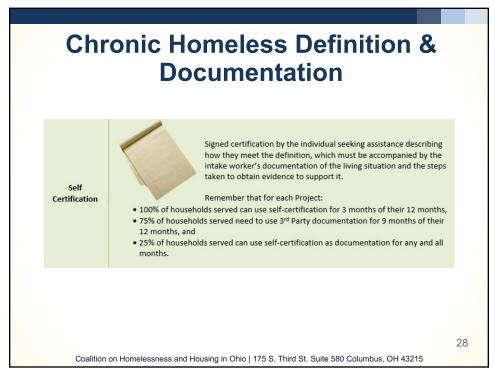
2. Has been homeless for at least 12 continuous months OR on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included 7 consecutive nights of not living unsheltered, in a safe haven, or in an emergency shelter

26

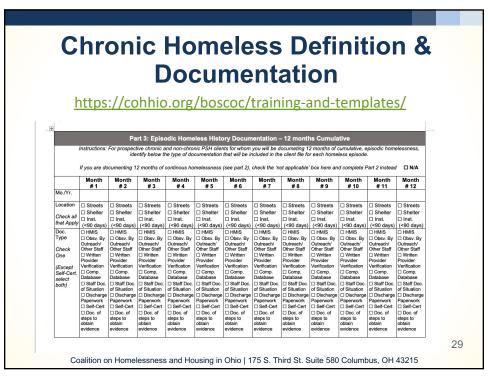
Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

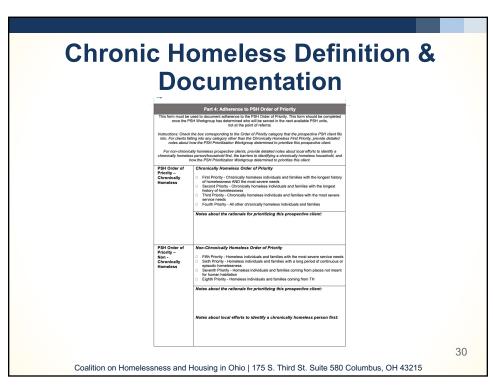






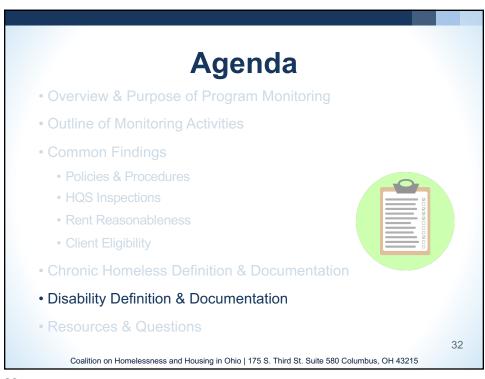








Chroni	c ł	do	m	reles	s Defi	nition	&
	D	00	Cu	ımer	ntation		
	env		olients mus		if their current housing status or		
	any past homeleanness is being documented by self-certification. Use multiple forms if messays: Applicant Name: Instructions: The message is an increase of the Applicant or recent equivalent points and the past three years that you self-sections and instructions are also as a section and instructions and instructions are also as a section and instructions and instructions are also associated as a section and instructions are also associated and instructions are also associated associated and instructions are also associated associated and instructions are also associated as						
	Entry Date	Exit Date (DD/MMYY)	# of Months	Verification Form as w Type of Location (verify project is homeless dedicated)	Eccation and Description	_	
	(DD/MM/YY)			□ Emergency Shelter □ Transitional Housing □ Unsheltered location □ Institution (< 90 days)			
				☐ Emergency Shelter ☐ Transitional Housing ☐ Unsheltered location ☐ Institution (< 90 days)			
				☐ Emergency Shelter ☐ Transitional Housing ☐ Unsheltered location ☐ Institution (< 90 days)			
				☐ Emergency Shelter ☐ Transitional Housing ☐ Unsheltered location ☐ Institution (< 90 days)			
	Applicant	statement o	flocation	(s) and period(s) of hom	elessness, if needed:		
	of my kno				d in this statement is true to the best information may result in termination	-	
	Applicant S				Date:		
	Staff Signat	ure:			Date:	_	31
Coalition on Homele	essness a	and Ho	using	in Ohio 175	S. Third St. Suite 580	Columbus, OH 4321	0.





Disability Definition & Documentation

Disability is defined as:

- Physical, mental, or emotional impairment, including impairment caused by alcohol or drug abuse, PTSD, brain injury, or chronic physical illness that
 - Is expected to be long-continuing or indefinite duration; and
 - Substantially impedes the person's ability to live independently; and
 - · Could be improved by more suitable housing
- 2. Developmental disability

33

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215

33

Disability Definition & Documentation

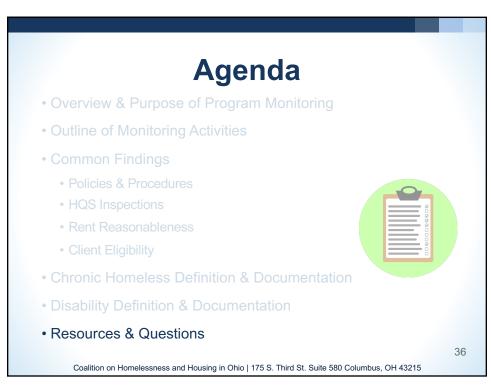
- Verification of a disability must be from a third-party (cannot be self certified)
- Documented disability verification must come from one of the following:
 - professional licensed by the State to diagnose and treat the disability and certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individuals ability to live independently
 - · Written verification from SSA
 - The receipt of a disability check
 - Intake staff-recorded observation of a disability that is confirmed and accompanied by evidence above within 45 days

34

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215



1	ability Definition & Documentation hio.org/boscoc/training-and-templates/	
-	Plat 9: Disability Status Plat 15: Disability Status	
	Part 6: Staff Certification By signing leave confly that the information presented in this packet - Parts 1 through 5 - in the so the leavet of my inconsisting. Staff Name (Printer)	
Coalition on Homelessne	ss and Housing in Ohio 175 S. Third St. Suite 580 Columbus, OH 43215	35







Monitoring Resources

CoC Program Toolkit:

https://www.hudexchange.info/programs/coc/toolkit/

• HUD Exchange Monitoring Binder:

https://www.hudexchange.info/homelessnessassistance/coc-esg-virtual-binders/coc-grantadministration/monitoring/

CoC Program Interim Rule:

https://www.govinfo.gov/content/pkg/CFR-2017-title24-vol3/xml/CFR-2017-title24-vol3-part578.xml

38

Coalition on Homelessness and Housing in Ohio | 175 S. Third St. Suite 580 Columbus, OH 43215









