

**Unified Supportive Housing System
Vacancy Management and Lease Up
Narrative Manual
and
Policies & Procedures**

Revised effective: 9 May 2022



Narrative Manual
Table of Contents

Purpose	4
Background	4
Goal	4
Key Terms	4
Acronyms	10
A. General Eligibility	12
B. General Eligibility Requirements for All USHS Managed Units	12
C. Required Documentation	16
D. Eligibility Determination	17
E. Prospective Applicant Rights	18
F. Nondiscrimination	19
G. Housing First	21
H. Housing Accommodations	21
I. Privacy Protections	21
J. Provider Agency Expectations	22
K. Housing Provider Expectations	22
L. USHS Program Manager Expectations	23
L. Appeals Due Process	23
N. USHS Grievance Process	25
O. Prospective Applicant Rejection of Housing	26
P. Appeal for Re-entry into the USHS Pool following Prospective Applicant's Rejection of Housing Opportunity	26
Q. Recordkeeping	26

Policies & Procedures
Table of Contents

Provider Agency Referrals to USHS	28
Acceptance of Forms	29
Determination of Prospective Applicant Eligibility	30
Prospective Applicant Identification	31
System Prioritization	33
Refreshing the Eligible Pool	37
USHS Referral to Housing Provider	38
USHS Housing Referrals for Incomplete Files Exception	41
Vacancy Management and Lease-Up	42
Housing Provider Rejection of Prospective Applicant	46

Prospective Applicant Rejection of Housing	47
Documentation of Homelessness	48
Documentation of a Certified Disability	50
Transfers between Programs	51
Emergency Transfer for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking	53
Temporary Relocation	56
Permanent Displacement	57
Absences from Units and Tenant Termination	59
Appendixes		
A. Appendix 1	60
B. Appendix 2	62
C. Appendix 3	63

Purpose

This set of policies and procedures provides administrative guidance and structure for the vacancy management and lease up processes of projects within the Unified Supportive Housing System.

Background

The Unified Supportive Housing System (USHS) is a collaborative effort managed by The Alcohol, Drug, and Mental Health Board of Franklin County (ADAMH), the Columbus Metropolitan Housing Authority (CMHA) and the Community Shelter Board (CSB). These partners work together with other agencies in the community including behavioral health, housing, shelter, and outreach providers. Funds from the Osteopathic Heritage Foundation, Fannie Mae and Battelle were used to develop the Unified Supportive Housing System.

Goal

The goal of USHS is to streamline and provide a standardized coordinated system for applying for, approving, and placing individuals and families experiencing homelessness and have the greatest vulnerability in permanent supportive housing. USHS is also designed to provide similar access to ADAMH supported non-homeless specific units provided in conjunction with units dedicated for people who are experiencing homelessness.

Key Terms

Break in Homelessness: At least seven (7) or more consecutive nights for which homelessness is not documented. If the break is less than seven (7) days, the time between one occasion and another can be counted towards homeless time. A break in homelessness for seven (7) days or more should be documented. Self-certification is an acceptable method of documentation only as it relates to non-homeless time to verify a specific break in homelessness.

Certification of Disability (COD)¹ –A USHS form that acts as verification of disability. The form must be signed by a professional licensed by the state to diagnose AND treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently. Certification of Disability forms do not expire.

Columbus Severity of Service Needs Tool (CSSNT) – standardized tool used to measure severity of service needs for individuals experiencing homelessness and eligible for permanent supportive housing.

Chronically Homeless (CH) Applicant–(a) “homeless individual with a disability” who:

- i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as

¹ Disability may also be documented via (HUD CH notice):Written verification from the Social Security Administration; The receipt of a disability check(e.g., Social Security Disability Insurance check or Veteran Disability Compensation)

the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;

(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 the facility;

(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) or (b) of this definition (as described in Section I.D.2. (a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.

(d) Households who are CH and enrolled in a Rapid Rehousing program retain CH status even if they move to permanent housing as long as they are enrolled in the Rapid Rehousing program. (HUD Final Rule: Defining Chronically Homeless, December 4, 2015)

Dating violence -violence committed by a person:

(1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and

(2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:

- (i) The length of the relationship;
- (ii) The type of relationship; and
- (iii) The frequency of interaction between the persons involved in the relationship.

Developmental Disability - as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002):

(1) A severe, chronic disability of an individual that—

- (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- (ii) Is manifested before the individual attains age 22;
- (iii) Is likely to continue indefinitely;
- (iv) Results in substantial functional limitations in three or more of the following areas of major life activity:
 - (A) Self-care;
 - (B) Receptive and expressive language;
 - (C) Learning;
 - (D) Mobility;
 - (E) Self-direction;

- (F) Capacity for independent living;
- (G) Economic self-sufficiency.

(v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(2) An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1)(i) through (v) of the definition of "developmental disability" in this section if the individual, without services and supports, has a high probability of meeting these criteria later in life.

Disabling Condition – a disabling condition is one or more of the following:

A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that:

- 1) Is expected to be long-continuing or of indefinite duration;
- 2) Substantially impedes the individual's ability to live independently; and
- 3) Could be improved by the provision of more suitable housing conditions.

A developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or

The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiologic agency for acquired immunodeficiency syndrome (HIV).

Domestic violence - felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

Family- regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

- a. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
- b. A group of persons residing together and such group includes, but is not limited to:
 - (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);

- (ii) An elderly family;
- (iii) A near-elderly family;
- (iv) A disabled family;
- (v) A displaced family; and
- (vi) The remaining member of a tenant family.

Full-Time Student- a person who is carrying a credit hour load that is considered full time for day students under the standards and practices of the educational institution attended. An educational institution includes a vocational school with a diploma or certificate program, as well as a higher educational institution offering an undergraduate, graduate, or professional degree.

Gender Identity- the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

<https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf>

Homeless Management Information System (HMIS) – Our community's homeless management information system (HMIS). Partner Agencies collect client data and enter it into this electronic database.

Housing Provider – agencies which manage housing projects within the USHS.

Identifying Documentation – documentation which discloses the full name, photo, date of birth, alien number and/or social security number. Identifying documentation is required as proof of identification and eligibility for housing. Examples of identifying documentation include copies of birth certificates or DD-214 (Veterans), social security cards, stated issued IDs, marriage licenses, Permanent Resident Cards, and passports.

Individual Housing Stabilization Plan – time-defined plan used to identify and prioritize actions related to keeping housing and tenant's individual goals.

Long Periods of Episodic Homelessness – homeless adult or child with a disability that doesn't meet the definition for HUD Chronicity, but has 12 months of homeless time over the past 3 years that totals less than 4 episodes of homelessness and is currently 1) Living in a place not meant for human habitation, a safe haven, or in an emergency shelter. 2) Living in transitional housing for the formerly homeless if the individual met #1 immediately prior to entry. 3) 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 #1, immediately prior to entering that facility.

Non-Chronically Homeless Applicant- homeless adult or child with a disability that doesn't meet the definition for HUD Chronicity, but is currently 1) Living in a place not meant for human habitation, a safe haven, or in an emergency shelter. 2) Living in transitional housing for the formerly homeless if the individual met #1 immediately prior to entry. 3) 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 #1, immediately prior to entering that facility.

Non-Homeless Applicant– a non-homeless individual with a disability, including those who are exiting institutional settings (treatment programs, hospitals, nursing homes, correctional institutions) who were not homeless immediately prior to entry. This eligibility applies to Veteran, Medical, and Disabled Non-Homeless units.

Notification of Incompatibility (NOI) – the written notification a Provider Agency receives from the USHS Program Manager when a Prospective Applicant is deemed incompatible with USHS Policies & Procedures or Provider Agency’s Tenant Selection Plan, making the obtainment of housing through USHS unlikely.

Permanent Housing – community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.

Permanent Supportive Housing (PSH) – community-based housing without a designated length of stay, inclusive of supportive services focused on assisting individuals experiencing homelessness with disabilities to live independently. Permanent Supportive Housing can be single or scattered site.

Project-Based Rental Assistance (PBRA) - housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

Prospective Applicant – an individual who is literally homeless and meets USHS eligibility guidelines.

Prospective Applicant File – file which includes signed, dated and current ROI, COD, documentation of homelessness (if applicable), copy of current state-issued photo ID with Franklin County address, accurate birth certificate or DD-214 (Veterans), social security card or printout from the Social Security Administration verifying social security number, Columbus Severity of Service Needs Assessment, and proof of all income and eligibility forms. All of the above documentation must be included for Prospective Applicant File to be complete.

Provider Agency – agency working with USHS that has direct contact with Prospective Applicants such as emergency shelters, outreach and rapid re-housing providers. For ADAMH units, CHN staff working with their Provider Agencies will fulfill these responsibilities; for units that the Housing Provider controls (non-homeless and non-ADAMH), the Housing Provider will fulfill these responsibilities. See Provider Agency Expectations for more information.

Rapid Re-housing - a permanent housing project that provides housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a

homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Release of Information (ROI) – legal document authorizing the release of Prospective Applicant information.

Severe Service Needs: an individual for whom at least one of the following is true: 1) history of high utilization of crisis services, which include, but are not limited to, emergency rooms, jails, and psychiatric facilities; 2) significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing; 3) for youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations; 4) when applicable, an alternate criteria used by Medicaid departments to identify high-need, high-cost beneficiaries. The Columbus Severity of Service Needs Assessment is used to determine severity of service needs.

Sexual Assault - any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Sponsor-Based Rental Assistance (SBRA) - housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization.

Stalking - engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

Tenant-Based Rental Assistance (TBRA) - rental assistance in which program participants choose housing of an appropriate size in which to reside.

Tenant Selection Plan – housing provider’s description of the eligibility requirements and selection process for admission into the housing program, including such things as income limits and exclusionary criteria. Tenant selection plans are utilized to ensure fair, consistent and equal treatment of Prospective Applicants. Tenant selection plans dedicate the units to chronically homeless clients.

Transitional Housing- housing, the purpose of which is to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months.

USHS Program Manager – CSB staff member responsible for processing documents to determine preliminary eligibility for housing through vacancy management and lease-up procedures.

Verification of Street Homeless Form – form utilized by USHS-approved outreach worker to verify and document current and literal homelessness in a place not meant for human habitation.

Acronyms

Alcohol, Drug and Mental Health Board (ADAMH)	Department of Housing and Urban Development (HUD)	Release of Information (ROI)	Temporary Assistance for Needy Families (TANF)
Certification of Disability (COD) Columbus Metropolitan Housing Authority (CMHA)	Federal Adjustment Bureau, Inc. (FABCO) Ohio Department of Jobs & Family Services (ODJFS)	Social Security Administration (SSA) Social Security Disability Income (SSDI)	Tenant-Based Rental Assistance (TBRA) Unified Supportive Housing System (USHS)
Columbus Severity of Service Needs Tool (CSSNT)	Permanent Supportive Housing (PSH)	Social Security Insurance (SSI)	Violence Against Women Act of 1994 (VAWA)
Community Shelter Board (CSB)	Project-Based Rental Assistance (PBRA)	Social Security Number (SSN)	
Date of Birth (DOB)	Rapid Rehousing (RRH)	Sponsor-Based Rental Assistance (SBRA)	

**Unified Supportive Housing System
Vacancy Management and Lease up Narrative Manual**

This section is intended to compliment the established USHS Policies & Procedures.

A. General Eligibility

USHS serves single adults, couples and families, with a disability. These individuals may be HUD Chronically Homeless, Non-Chronically Homeless or Non-Homeless. HUD Chronic households must have a head of household that is disabled. This Head of Household may be a minor if no adult is present in the household. Non HUD-Chronic household must have at least one household member who is disabled, this includes minor children in the household.

Eligibility for housing is also dependent on household income, and housing project and unit size. The information submitted on the Prospective Applicant's behalf will be utilized by the USHS Program Manager to determine preliminary eligibility and appropriate placement in USHS housing units. Prospective Applicants cannot be recommended to the Housing Provider prior to USHS eligibility screening and review.

ADAMH and other low-income units may not require homelessness as part of their eligibility guidelines.

Further documentation and eligibility screenings may be requested by the Housing Provider and CMHA (as required) prior to a Prospective Applicant's approval and/or placement in a unit.

B. General Eligibility Requirements for All USHS Managed Units

1. Homeless Dedicated Units

All persons considered for placement for units dedicated to people experiencing homelessness must meet the following eligibility, and provide necessary documentation to establish eligibility per the details below:

- **Disability.** Prospective Applicants must have documentation of a certified disability. For HUD Chronicity, the Head of Household must be disabled. For non-HUD Chronic households, the household must provide documentation that one member of the household is disabled.
- **Proof of Identity, Social Security Number.** Prospective Applicants must have verification of each adult household member's identity and social security number.
- **Citizenship or Naturalization.** Prospective Applicants must be a United States (U.S.) citizen or national or noncitizen with eligible immigration status in accordance with HUD Notice H-95-55.²
- **Household Composition.** Prospective Applicants must have documentation of household composition when there are minor and/or dependent children in the household.
- **Income.** Household income cannot exceed that of the HUD defined "extremely low income," 30% of AMI. Income documentation may need to be updated before submission to the Housing Provider.

² Exception may be allowed for certain units funded with private or local government funds.

- **Residency.** Prospective Applicants must be residents of Franklin County, Ohio.
- **Homelessness.** Prospective Applicants must be literally homeless residing in emergency shelter, transitional housing, or place not meant for human habitation.
- **Duration of Homelessness.** Prospective Applicants must have documentation of the length of time they have experienced homelessness.
- **Complete Prospective Applicant File.** All Prospective Applicants must have completed all required forms. Prospective Applicant name, date of birth and gender must be consistent across documentation or documentation of legal name change must be submitted.³

Other eligibility requirements related to particular funding streams:

2. CMHA Housing Choice Voucher Units Managed by USHS (may or may not include CoC Program funded units)

- **Drug-Related or Violent Criminal Activity.** Prospective Applicants cannot have conviction of or eviction from CMHA or other federal voucher housing program due to drug-related criminal activity or violent criminal activity (see Appendix 1 for disqualifying offenses) within one year of final eligibility determination date, including criminal activity by any family member listed in a family's Prospective Applicant File. (CMHA HCVAdminPlan-01-15-2016 pg.32)
- **Evictions.** Prospective Applicants who left the voucher program involuntarily due to eviction or violation of program rules are ineligible for housing for one year after said departure, which begins at the termination date of the previous housing assistance or court-approved eviction date.
- **CMHA life-time ban from housing.** Applies (1) to Prospective Applicants who manufactured or produced methamphetamine on the premises of any federally assisted housing, (2) if a member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program at any time.
- **Outstanding Debt.** Prospective Applicants cannot have an outstanding debt owed to CMHA or other housing authorities. Placement in USHS housing units that have CMHA vouchers or subsidies cannot occur until all outstanding debts are paid to CMHA. In the event CMHA has determined that a Prospective Applicant has committed fraud, a lifetime ban is in effect, regardless of repayment. Financial assistance through CSB may be available to assist homeless Prospective Applicants with outstanding debts owed to CMHA.
- **Violation of Family Obligation.** Prospective Applicants cannot have left previous tenancy under the Section 8 Program in violation of a family obligation under the Housing Choice Voucher Program. Those individuals who have previously left tenancy in violation of a family obligation are not eligible for Section 8 vouchers and are not able to apply for most USHS housing units.

³ Please see Section C: Required Documentation, for guidance.

3. CoC Program and HOME Funded Units

- **Drug-Related or Violent Criminal Activity.** Units supported with CoC Program funding do not have restrictions around criminal offenses or past arrearages or evictions. Therefore, Housing Providers are expected to follow Housing First standards and Fair Housing laws when selecting tenants. Explicitly, Housing Providers will:
 - i. Not make exclusions because of one or more prior arrests (without conviction). This includes open criminal cases and warrants (without conviction).
 - ii. Not apply blanket prohibition on any person with any conviction record.
 - iii. Show that any policy that excludes individuals with only certain types of convictions is necessary to serve a “substantial, legitimate, nondiscriminatory interest.” The policy must accurately distinguish between criminal conduct that indicates a demonstrable risk to resident safety and/or property and criminal conduct that does not.
 - iv. Show that any policy related to criminal background considers the nature and severity and recency of an individual’s conviction.

4. Tax Credit Units

Prospective Applicants must not be currently enrolled as a full-time student, unless Prospective Applicant meets income eligibility criteria as set forth by the housing project and falls under one of the following five exceptions outlined in Section 42 of the IRS Code:

- Prospective Applicant is receiving assistance under Title IV of the Social Security Act (e.g., TANF).
- Prospective Applicant was previously under the care and placement responsibility of the local county children services agency (i.e., foster care).
- Prospective Applicant is enrolled in a government-sponsored job training program.
- Prospective Applicant is married and eligible to file a joint income tax return.
- Prospective Applicant is a single parent household with at least one dependent child. The parent is not the dependent of another individual and the child is only a dependent of the resident or the other, non-resident parent.

Additionally, Prospective Applicants, who are part time students or are pursuing a GED, are eligible for tax credit units.

5. Family Units and Occupancy

USHS considers a woman in her first or second trimester of pregnancy, a family of one and a woman in her third trimester a family of two. Pregnant women with disabilities should be accommodated in one-bedroom units up to the 7th month of pregnancy. After the 7th month, the pregnant women can be accommodated in a two-bedroom unit. HUD doesn’t consider two people in a one-bedroom unit to be “overcrowded.” Therefore, if a pregnant tenant, who gives birth, continues to meet all other eligibility criteria for residing in a one-bedroom unit & wishes

to continue to reside in current unit, then the tenant may continue to stay and cannot be asked to leave. (HUD Guidance received September 18, 2014)

With respect to bedroom size, the existing occupancy requirements of HUD's public and assisted housing programs already address the number of persons who may occupy one bedroom. Standards allow 2 persons per living/sleeping room and would permit the following occupancy conditions, assuming that a living room qualifies as a living/sleeping area:

Bedroom Size	Minimum No. of Persons in Household	Maximum No. of Persons in Household
0-BR	1	1
1_BR	1	4
2-BR	2	6
3-BR	3	8
4-BR	4	10
5-BR	5	12
6-BR	6	14

Standards for occupancy are also subject to the following guidelines:

- It will not be necessary for persons of different generations or opposite sex, except for spouses (or those living as spouses) to occupy the same bedroom;
- Two children of the same sex may share a bedroom. CMHA/CSB may grant a larger bedroom size to accommodate different generations (ten years or greater);
- A single head of household shall not be required to share a bedroom with his/her children; and,
- A single individual with no other children who informs CMHA/CSB that she is pregnant at the time of her housing referral may be assigned a 2-Bedroom unit (see above on pregnancy considerations).

6. Miscellaneous Eligibility

May be required for some units, based on Tenant Selection Plans:

- Prospective Applicants convicted of any type of sex offense or required to register as a sex offender are, in some cases, ineligible for certain units within USHS.
- Prospective Applicants may not have conviction for or eviction from housing due to arson. Prospective applicants convicted of arson or who left prior housing due to arson are, in some cases, ineligible for units within USHS. Exceptions may be made for prospective applicants by the Housing Provider, based on their Tenant Selection Plan.

C. Required Documentation

All persons considered for placement in USHS units must provide necessary documentation to establish eligibility per the details below:

1. Head of Household for HUD Chronically Homeless Units or Individuals and Families with a Disability for Non-HUD Chronically Homeless Units. All PSH units serving the homeless population are dedicated to individuals and families meeting the chronic homeless definition.

- **Disability.** The following forms of documentation will be accepted for the Head of Household or, if not chronically homeless, a disabled member of the household):

(1) Written verification from a professional who is licensed by the state to diagnose and treat that condition, stating that the disability is expected to be long-continuing or of indefinite duration and that the disability substantially impedes the individual's ability to live independently; or

(2) Written verification from the Social Security Administration, or the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation).⁴

In certain exceptional situations CSB can authorize intake use of staff-recorded observation of disability to document disability status as long as the disability is confirmed by the aforementioned evidence within 45 days of the application for assistance. This is done only with CSB's prior approval.

- **Citizenship or Naturalization.**⁵ Supporting documentation includes:
 - (1) U.S. birth certificate or DD-214 (Veterans),
 - (2) U.S. passport,
 - (3) U.S. certification of naturalization,
 - (4) U.S. permanent resident card or arrival-departure record with one of the annotations found in Appendix 2 of this document.
- **Residency.** Residency is established by documentation that the State of Ohio has issued a valid photo ID or Driver's License for the Prospective Applicant with a Franklin County Address except in extenuating circumstances when deemed appropriate by CSB.
- **Homelessness.** Documentation of homelessness must be from) HMIS Entry/Exit Record or Verification of Street Homelessness Form from an Approved Outreach Provider. The only exception to this is a formal verification of residency on letterhead from CHOICES for Victims of Domestic Violence. The Eligibility & Prioritization form along with the Length of Stay Calculator must be used to document duration of homelessness, occasions and homeless prioritization criteria.⁶

⁴ This doesn't include Survivor's Benefits or Social Security Retirement

⁵ Exception may be made in extenuating circumstances and as allowed by law.

⁶ Please see Procedure: Documentation of Homeless Time, for guidance.

- **Inconsistency of Documentation.** If full name on Photo ID and Social Security Card do not match, additional documentation will be requested. If first name, middle name and date of birth match the birth certificate, CSB will not require copies of marriage abstracts and divorce decrees to confirm identity. If first name, middle name, or date of birth do not match with birth certificate, CSB will require further documentation to confirm identity. Acceptable documentation of legal name change is a marriage certificate or abstract, divorce decree, court documentation, or documentation of name correction.
- **Complete Prospective Applicant File.** The Prospective Applicant must complete and sign all paperwork. Prospective Applicant File is active for 6 months from the date of Prospective Applicant's signature on the ROI.
- **Pregnancy.** For pregnant women to be prioritized for housing, they must provide verification of pregnancy. Prioritization of pregnant women has been approved by HUD.

2. Household Members over the age of 18

- **Proof of Identity.** All household members 18 or older must provide a clean copy of valid government-issued photo identification or driver's license, except in extenuating circumstances and as allowed by law, when deemed appropriate by CSB.
- **Income Documentation.** All adults in the Prospective Applicant's household must provide proof of income received. Cash benefits may include, but are not limited to: veteran's benefits (military pay), SSI, SSDI, unemployment, TANF (general public assistance), court-ordered or informal child support, alimony, pensions, educational financial assistance (Financial Aid), or worker's compensation, dated within 30 days of submission. Prospective Applicants must provide documentation of one month of income. A completed, signed and dated USHS Declaration of Zero Income form is required for all adults who do not have income.
- **Household Composition.** All Prospective Applicants in households with minor and/or dependent children must provide a printout from the ODJFS, custody records, or school records. This documentation serves as verification of household composition. If the Head of Household is listed as the biological mother or father, and no other documents are available, the Head of Household may sign a sworn affidavit to attest the child is a member of the household.
- **Individual Files** – All adults in a household who are eligible for PSH must complete a separate Prospective Applicant File. In the case a household member decides to leave the initial PSH unit, he/she would need to prove eligibility for a unit transfer, if applicable, and/or the remaining member(s) would have to prove eligibility to remain in the current housing.

3. All Household Members

- **Proof of Identity.** All household members must provide legible copy of his or her social security card or SSA verification of social security number and a birth certificate or DD-214(Veterans), copy of letter/form requesting birth certificate or a valid U.S. passport.

D. Eligibility Determination

Provider Agencies will submit a Demographics Form, Release of Information and all required documentation⁷ to the USHS Program Manager. The information in the Prospective Applicant File will be utilized by the USHS Program Manager to determine preliminary eligibility and appropriate placement in USHS housing units. USHS File is valid for 6 months from the ROI signature date, unless the client is successfully housed outside of or becomes ineligible for USHS (i.e. moves outside the CoC service area, no longer literally homeless, becomes over-income, etc.).

In no instance can an individual or head of household be considered literally homeless if they are exiting an institution where they resided for 90 days or longer, even if they met all of the criteria of the definition of chronically homeless prior to entering the institution, because that entire period residing in the institution is considered a break. This means the individual or head of household who entered the institution from the streets or shelter would not be considered literally homeless on or after the 90th day in an institutional setting.

Additionally, individuals or families who were literally homeless upon admission to Rapid Re-housing services maintain their literal homeless and chronic homeless (if applicable) status for eligibility purposes so long as they are enrolled in Rapid Re-housing and even if they subsequently move to permanent housing while awaiting a PSH unit. However, when a household enrolled in Rapid Re-housing is placed in permanent housing they no longer accumulate homeless time for chronic homelessness.

Veterans residing in a Grant and Per Diem (GPD) bed also maintain literal homeless status achieved prior to entry, but no longer accumulate homeless time for chronic homelessness. Veterans maintain CH status while in GPD and are eligible for HUD funded PSH. After USHS referral to the Housing Provider, further documentation and eligibility screenings, such as verification of income, criminal background and identification, will be conducted by the Housing Provider and/or CMHA (as required) prior to a Prospective Applicant's approval and/or placement in a unit.

E. Prospective Applicant Rights

Provider Agencies are responsible for ensuring Prospective Applicants' rights are protected and that Prospective Applicants are informed of their rights and responsibilities. Participants shall have these rights explained to them verbally and in writing when they fill out the Prospective Applicant file.

Reasonable efforts must be made to ensure that all participants, regardless of language or ability, understand their rights and responsibilities. At a minimum, Prospective Applicant rights include:

- The right to be treated with dignity and respect;
- The right to privacy;
- The right to be treated with cultural sensitivity;
- The right to have an advocate present during the appeals process;

⁷ Please refer to Procedure: Acceptance of Forms for documentation standards.

- The right to request a reasonable accommodation in accordance with the Housing Provider's Tenant Selection Plan;
- The right to safe, decent and sanitary housing in good repair;
- The right to accept housing offered or to reject substandard housing; and
- The right to confidentiality and information regarding when confidential information will be disclosed, to whom, and for what purpose, as well as the right to deny disclosure. Prospective Applicants must be informed that participation in USHS requires certain information to be collected and provided to CSB, CMHA and Housing Providers. Prospective Applicants who choose not to release such information are ineligible for placement in USHS units.

F. Nondiscrimination

Community Shelter Board will comply with the nondiscrimination provisions of federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act and Title II or III of the Americans with Disabilities Act, and the Equal Access Rule as applicable. In accordance with these requirements, CSB and Housing Providers ensure that housing and supportive services are provided in the most integrated setting appropriate to the needs of persons with disabilities. Additional requirements, related to the Fair Housing Act, Americans with Disabilities Act, and the Equal Access Rule, are below.

1. Fair Housing Act

No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right.
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap.
- This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

If Prospective Applicant or other household member has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental

illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities, have a record of such a disability or are regarded as having such a disability landlord may not:

- Refuse to let tenant make reasonable modifications to your dwelling or common use areas, at tenant expense, if necessary for the disabled person to use the housing.
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary for the disabled person to use the housing.

Housing Opportunities for Families:

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age of 18 live with:

- A parent
- A person who has legal custody of the child or children or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under the age of 18.

2. Title II and III of the Americans with Disabilities Act

State and local governments:

- May not refuse to allow a person with a disability to participate in a service, program, or activity simply because the person has a disability.
- Must provide programs and services in an integrated setting, unless separate or different measures are necessary to ensure equal opportunity.
- Must eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an equal opportunity to enjoy their services, programs or activities unless "necessary" for the provisions of the service, program or activity.
- Are required to make reasonable modifications in policies, practices, and procedures that deny equal access to individuals with disabilities, unless a fundamental alteration in the program would result.
- Must furnish auxiliary aids and services when necessary to ensure effective communication, unless an undue burden or fundamental alteration would result.
- May provide special benefits, beyond those required by the regulation, to individuals with disabilities.
- May not place special charges on individuals with disabilities to cover the costs of measures necessary to ensure nondiscriminatory treatment, such as making modifications required to provide program accessibility or providing qualified interpreters.
- Shall operate their programs so that, when viewed in their entirety, they are readily accessible to and usable by individuals with disabilities.

3. Equal Access Rule

A permanent supportive housing program that serves families must serve all types of families and cannot discriminate against any family based on marital status, actual or perceived sexual orientation of the family members, or gender identities of the family members. Therefore, if two adults present together as a family with or without children, the recipient or sub recipient must serve the two adults as a family and may not require proof of marriage and may not limit assistance to couples in a heterosexual relationship.

4. VAWA

An applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

A tenant in a covered housing program may not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if:

- (i) The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and
- (ii) The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking.

G. Housing First

Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to quickly secure permanent housing, maximize housing stability, and prevent returns to homelessness, as opposed to addressing predetermined treatment goals prior to permanent housing entry. Additionally, Prospective Applicant and tenant participation in supportive services is voluntary. Provider Agencies and Housing Providers are expected to adhere to the Housing First approach to housing Prospective Applicants.

H. Housing Accommodations

If a Prospective Applicant has a physical disability that limits access to the PSH site offered, the Provider Agency will submit a statement by a medical doctor to USHS as soon as access challenges become known. The statement will be on official letterhead and request that the Prospective Applicant be offered the next available unit when he/she is eligible.

Additionally, if a PSH unit would put a Prospective Applicant at risk of bodily harm from another resident due to past history of domestic dispute, physical altercation, or abuse, the Provider Agency will provide a statement from the Prospective Applicant to accompany his/her file.

I. Privacy Protections⁸

All information gathered for application purposes require client consent and signed ROI. Identifying information including first and last name, a home or other physical address, contact information, social security number, and any other information, including date of birth, racial or ethnic background, or religious affiliation, that in combination with any other non-personally identifying information would serve to identify any individual will be properly used with the consent of the Prospective Applicant.

J. Provider Agency Expectations

Provider Agencies requesting USHS placement services in homeless units shall utilize the Columbus Severity of Service Needs Assessment and duration of homeless time to identify potentially eligible individuals. These individuals must be literally homeless with a certified disability. Provider Agencies are expected to assist Prospective Applicants in the completion of all necessary USHS forms and obtaining necessary documentation. Provider Agencies are accountable for the following:

- Adhere to all USHS policies and procedures contained in the *Unified Supportive Housing System Vacancy Management and Lease Up Narrative Manual and Policies & Procedures*, or otherwise communicated by CSB.
- Attendance at USHS training sessions.
- Certification of any staff member who will submit a Prospective Applicant application.
- Use of current forms to refer Prospective Applicants.
- Submission of said forms and other necessary documentation to USHS Program Manager.
- Continuous contact, meaning support for the Prospective Applicant including navigation through housing application and appointments. The appropriate, individualized level of assistance should be provided to ensure a rapid and positive housing outcome.
- Contact with the Housing Provider as needed on Prospective Applicant's behalf.
- Ongoing communication with the Prospective Applicant regarding his or her status in the application and housing selection process.
- Serve as the primary contact for the Prospective Applicant while his/her application is in the USHS Pools. (The USHS Program Manager is not intended to have direct contact with applicants.)
- Provide the Prospective Applicant with education and advocacy concerning all of their rights, including the right to file grievances and appeals.

K. Housing Provider Expectations

Housing Providers are accountable for the following:

- Adhere to all USHS policies and procedures contained in the *Unified Supportive Housing System Vacancy Management and Lease Up Narrative Manual and Policies & Procedures*, or otherwise communicated by CSB.
- Housing Providers requesting USHS placement services shall identify housing opportunities and provide appropriate support for Prospective Applicants, in

⁸ Please see Section P: Recordkeeping for handling, storage and destruction information.

coordination with Provider Agencies, to ensure that vacancies are filled by the most vulnerable Prospective Applicants.

- Notification within two business days to the USHS Program Manager of vacancies, status of Prospective Applicant eligibility and lease-up.
- Continuous correspondence with Provider Agency for Prospective Applicant contact and follow up.
- Notification within two business days of housing disposition (Approval, Barriers or Denial) to the Provider Agency and USHS Program Manager.
- Timely inspection and preparation of unit, and efficient applicant processing and support to ensure unit move-in as quickly as possible.
- After a Potential Applicant is approved for housing, the Housing Provider will ensure that project entry is entered into HMIS within CSB required timeframes to reflect that the Prospective Applicant has successfully moved into his or her unit.

L. USHS Program Manager Expectations

The USHS Program Manager will follow written policies and procedures to determine Prospective Applicant eligibility, homeless status and vulnerability, to ensure implementation of HUD and local standards. Only the highest priority Prospective Applicants matching Housing Provider eligibility will be forwarded to fill vacancies.

- Adhere to all USHS policies and procedures contained in the *Unified Supportive Housing System Vacancy Management and Lease Up Narrative Manual and Policies & Procedures*, or otherwise communicated by CSB.
- Initial review within two business days of Prospective Applicant File to determine whether file is complete or incomplete.
- Determination within two business days of eligibility and prioritization upon receiving completed Prospective Applicant File and possible housing incompatibility with available units (e.g., history of arson, conviction of distribution and manufacturing of drugs, sexual offender status or sexual based offenses, recent criminal history, open or unresolved court cases and active warrants).
- Scoring of Columbus Severity of Service Needs Assessment.
- Notification within two business days of eligibility disposition and, if applicable, prioritization status and possible housing barriers to Provider Agencies.
- Notification within two business days of housing referral to Provider Agency.
- Maintenance of prioritized pool of eligible Prospective Applicants.
- Follow up with Housing Providers and Provider Agencies as needed.
- Ongoing training opportunities to Housing Providers and Provider Agencies on utilization of required forms and documentation.

M. Appeals Due Process⁹

Prospective Applicants may appeal eligibility decisions directly with the agency responsible for the denial.

⁹ Please see Section N: Prospective Applicant Rejection of Housing, for guidance on continued eligibility in the pool after a Prospective Applicant rejects housing opportunity.

1. Appeal of USHS Eligibility Determination

Upon submission, USHS will review the preliminary Prospective Applicant File for completeness, accuracy, and adherence to program policies and procedures. Once the file is complete, if the Prospective Applicant is determined to be ineligible for USHS housing, USHS will notify the Prospective Applicant and the Provider Agency. The Provider Agency will notify the Prospective Applicant and provide information on the right to appeal through the USHS Grievance Process.

2. Appeal of Housing Provider Eligibility Determination

A Prospective Applicant has the right to appeal the Housing Provider's decision to deny the Prospective Applicant placement at the Housing Provider's housing site. This appeals process will be governed by the Housing Provider's current appeals process. Prospective Applicants who do not meet eligibility and/or are denied service must be informed by designated staff, provided an explanation of the reasons for denial, and told how to appeal the denial per the Housing Provider's current appeals process. Information on the Housing Provider's appeals process will be provided to the Provider Agency and the Prospective Applicant by the Housing Provider.

3. Appeal of CMHA Eligibility Determination

A Prospective Applicant who is denied eligibility for or admission to the Housing Choice Voucher Program at either the Preliminary or Full Application stage are entitled to an informal review of the decision. Prospective Applicants must submit their request for a review in writing to CMHA within 10 calendar days from the date of the notification.

CMHA

880 E. 11th Ave.

Columbus, OH 43211-2771

614-421-6000

4. Fair Housing Discrimination

HUD is ready to help with any problem of housing discrimination. If you a client believes that their rights have been violated, the Housing Discrimination Complaint Form at: <https://portal.hud.gov/FHEO903/Form903/Form903Start.action> is available for to download, complete and return, or complete online and submit, or client may write HUD a letter, or telephone the nearest HUD Office. Client has one year after an alleged violation to file a complaint with HUD, but should file it as soon as possible.

Chicago Regional Office of FHEO

U.S. Department of Housing and Urban Development

Ralph H. Metcalfe Federal Building

77 West Jackson Boulevard, Room 2101

Chicago, Illinois 60604-3507

(312) 353-7776 ext. 2453

(800) 765-9372

TTY (312) 353-7143

5. Civil Rights Discrimination

Clients who believe they have been discriminated against because of race, color or national origin by an entity receiving financial assistance from HHS, them or their legal representative may file a complaint with OCR. Complaints must be filed within 180 days from the date of the alleged discrimination. They may send a written complaint or may complete and send OCR the Complaint Form at www.hhs.gov/ocr. Complaints may also be mailed to OCR Headquarters at the following address:

Ohio Civil Rights Commission
30 E Broad Street, 4th Floor
Columbus, Ohio 43215-3414
Phone: 614-466-7242
Email: Andrew.Seifert@civ.ohio.gov

6. Disability Discrimination

Clients who believe they have been a victim of discrimination prohibited by the Disability ACT, they may file a complaint. Complaints on behalf of classes of individuals are also permitted. Complaints should be in writing, signed by the complainant or an authorized representative, and should contain the complainant's name and address and describe the public entity's alleged discriminatory action.

Complaints may be sent to –

Disability Rights Section
Civil Rights Division
U.S. Department of Justice
P.O. Box 66738
Washington, D.C. 20035-6738

Complaints may also be sent to agencies designated to process complaints under the regulation, or to agencies that provide Federal financial assistance to the program in question.

7. Equal Access Discrimination

Transgender and other gender nonconforming clients are encouraged to file complaints if they believe they have been denied equal access to temporary, emergency shelters, other buildings and facilities, programs, services, accommodations or benefits in accordance with their gender identity. Clients may file complaints of discrimination based on gender identity by calling 1-800-669-9777 (toll-free) or online at <https://portal.hud.gov/FHEO903/Form903/Form903Start.action>. Clients who are deaf or hard of hearing or who have speech impairments may file a complaint via TTY by calling the Federal Relay Service at 1-800-877-8339 (toll-free).

N. USHS Grievance Process for Homeless-Dedicated Units¹⁰

A Prospective Applicant has the right to file a grievance with the USHS if he or she believes his or her rights were violated during the eligibility screening process. Grievances shall be filed with USHS in writing within five (5) business days of the alleged violation of rights or cause of grievance. Failure to file within this period does not preclude a grievance from being addressed. The Prospective Applicant will be provided an informal hearing with the USHS Program Manager, a representative of CSB and a representative from CMHA (only if CMHA is involved in the unit in question). The Prospective Applicant has the option of a representative from the Provider Agency or other representative of the Prospective Applicant's choice in an effort to resolve the grievance.

O. Prospective Applicant Rejection of Housing¹¹

The Prospective Applicant is expected to tour housing project or unit before rejection of available unit. USHS will offer up to two housing units to the Prospective Applicant from the housing inventory available within USHS, as all housing within USHS is considered safe, decent, and affordable. If/when a Prospective Applicant rejects housing for the 2nd time his/her file will be returned to the Provider Agency for placement in other suitable community housing outside of the USHS Pool. The Prospective Applicant will be ineligible for USHS housing for a one (1) year period after s/he rejects the 2nd housing unit from the housing inventory available within USHS. Provider Agency will continue to seek appropriate housing for the Prospective Applicant and will follow corresponding shelter guidelines, including supporting Prospective Applicants with achieving their individualized housing stabilization plans.

P. Appeal for Re-entry into the USHS Pool following Prospective Applicant's Rejection of Housing Opportunity

The Provider Agency appeals to the CSB's Associate Director presenting extenuating circumstances making the second housing option impossible to accept by the Prospective Applicant. If the Provider Agency is not satisfied with the outcome, the Provider Agency can request that an appeal be heard by CSB's Executive Director, or designee, for final determination.

Q. Recordkeeping

1. USHS Program Files

All USHS program files will be maintained onsite for the current and previous fiscal year, then maintained offsite in secure storage for four (4) years.

2. USHS Prospective Applicant Files

All USHS Prospective Applicant Files for individuals and families who were successfully housed though USHS will be maintained onsite for the current and previous three (3) fiscal years and then maintained offsite in secure storage for an additional five (5) years.

¹⁰ See Policies & Procedures beginning on page 17 for details on each step within the USHS process.

¹¹ The only two exceptions to refusing housing and remaining in the USHS pool are those listed in Section G: Housing Accommodations.

**Unified Supportive Housing System
Vacancy Management and Lease up Policies & Procedures**

Procedure Name: Provider Agency Referrals to USHS

Policy:

Prospective Applicants' referrals to USHS for placement in housing will be accepted by USHS on an ongoing basis.

Procedures:

- Prospective Applicants who do not sign a Release of Information (ROI) are not eligible and cannot be considered for USHS housing.
- The Provider Agency will send the completed forms and documentation to USHS.¹²
- The Prospective Applicant File will expire six (6) months from the date of the Prospective Applicant's signature on the ROI. The Prospective Applicant will need to submit a new Prospective Applicant File when the original Prospective Applicant File expires to maintain active status for housing consideration.

Adopted: March 2010

Revised: August 2017

¹² Please refer to additional expectations under I: Provider Agency Expectations

Procedure Name: Acceptance of Forms

Policy:

The USHS Program Manager will not accept incomplete Prospective Applicant Files. An incomplete file is one that does not adhere to Unified Supportive Housing System Narrative Manual and Policies & Procedures and includes a file without the following: a signature and/or date, appropriate disability documentation, current and legible applicant documentation or incomplete/missing information.

Procedures:

- All forms will be organized with the File Submission Checklist as the first page and will be certified as accurate by the Provider Agency representative.
- Name spelling, date of birth and gender must be consistent across all identifying documentation. If documentation is inconsistent, verification of legal name change must be submitted¹³.
- All adults in the household who are eligible for PSH must complete a separate Prospective Applicant File. In the case a household member decides to leave the initial PSH unit, he/she would need to prove eligibility for a unit transfer, if applicable, and/or the remaining member(s) would have to prove eligibility to remain in the current housing.
- Provider Agency case workers will be notified within two (2) business days if incomplete forms are received. Complete files may be resubmitted at any time.

Adopted: March 2010

Revised: February 2021

¹³ Refer to C: Required Documentation for guidance.

Procedure Name: Determination of Prospective Applicant Eligibility

Policy:

The USHS Program Manager must review all Prospective Applicants' eligibility for USHS housing units. Prospective Applicants cannot be recommended to the Housing Provider prior to USHS eligibility screening and review.

Procedures:

The USHS Program Manager will:

1. Conduct criminal background screening and national sex offender search using the Ohio Electronic Sex Offender Registration and Notification website (ESORN) and the Franklin County Municipal Court website to check Prospective Applicants' eligibility as files are received, immediately for chronically homeless Prospective Applicants and prior to forwarding Homeless or other Non-Homeless Prospective Applicants to the Housing Provider.
2. For family units, the USHS Program Manager will verify that a printout from ODJFS, court documentation, school records or proof of pregnancy is used to verify household composition, is present before forwarding Prospective Applicants to the Housing Provider. If the Head of Household is listed as the biological mother or father, and no other documents are available, the Head of Household may sign a sworn affidavit to attest the child is a member of the household.
3. Conduct criminal background checks through FABCO to check Prospective Applicants' eligibility.

Adopted: July 2011

Revised: May 2022

Procedure Name: Prospective Applicant Identification

Policy:

All homeless clients in the Columbus and Franklin County CoC geographic area will be prioritized for PSH opportunities based on the order of priority outlined in HUD Notice CPD-16-11 issued July 25, 2016. Individuals and families with a disability who are currently homeless and presumptively eligible and a priority for PSH according to HUD Notice will be identified using HMIS data, case conferencing, or by a provider agency. Clients identified as presumptively experiencing chronic homelessness will be invited to submit a USHS file. Other clients who are not presumptively chronically homeless, but who meet other prioritization criteria related to length of time homeless will be screened for vulnerability and may be invited to submit a USHS file based on their relative priority and PSH availability.

Procedures for Adults without Children

1. On at least an annual basis, USHS Program Manager will assess past and projected unit turnover and vacancies to determine the number of potential permanent supportive housing vacancies that will be available over a twelve-month period. This information is used to determine the corresponding average number of applications that should be active in the USHS pool on any given day in order to fill expected vacancies.
2. A minimum 30% more than the average amount of files needed on a monthly basis will be maintained in the USHS pool to fill occupancies available within the system.
3. All HUD chronically homeless clients will be invited to submit a complete USHS file.
4. All homeless clients with long periods of episodic homelessness will be invited to submit a Columbus Severity of Service Needs Assessment to determine the severity of service needs and relative priority in order to then determine if the potential applicant should be invited to submit a complete USHS file based on expected PSH availability.
5. If there are no HUD chronically homeless or homeless clients with long periods of episodic homelessness with severe service needs clients in the geographic area, lower priority clients who are homeless with severe service needs will be invited by the USHS Program Manager to submit a Columbus Severity of Service Needs Assessment, starting with those with the longest history of homeless time.
6. USHS Program Manager will review monthly the sources below to determine which clients should be solicited for Columbus Severity of Service Needs Assessment and/or a complete USHS Files:
 - CSB-produced “Hotlist” of the longest stayers based on HMIS data.
 - Mt Carmel Outreach Team recommendations of clients who are HUD chronically homeless, have long periods of episodic homelessness with severe service needs or are homeless with severe service needs who may not be documented

in HMIS. (System Manager will notify USHS Program Manager of any clients identified).

- System case conferencing recommendations of clients who are HUD chronically homeless, have long periods of episodic homelessness with severe service needs or are homeless with severe service needs. (System Manager will notify USHS Program Manager of any clients identified).
7. When additional USHS applications are needed, the USHS Program Manager will contact Provider Agencies working with clients who are presumptively eligible and a priority for PSH to request the Provider Agency contact those clients, inform them about USHS and PSH opportunities, and initiate a Columbus Severity of Service Needs Assessment or a USHS file.
 8. Provider Agency will notify the USHS Program Manager if a client refuses or is unable to accept the offer. (For example, if the client is incarcerated, missing or has other housing option scheduled.
 9. Provider Agency will electronically submit the Columbus Severity of Service Needs Assessment to the USHS Program Manager for scoring using only the HMIS ID as an identifier.
 10. If all resources are exhausted, the USHS Program Manager may solicit files for clients who Provider Agencies have determined are presumptively eligible for PSH and have significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.

Procedure for Adults with Minor and/or Dependent Children

Due to the small amount of inventory available for families, as units are available USHS will solicit Columbus Severity of Service Needs Assessments from Provider Agencies to be submitted electronically for clients the Provider Agency has determined have significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing as units become available. Out of the submissions the family with the highest priority and Columbus Severity of Service Needs Assessment will be invited to submit a complete USHS file.

Procedure for Victims of Domestic Violence

Without solicitation, CHOICES for victims of domestic violence may electronically submit Columbus Severity of Service Needs Assessments (using only the client's first name and no other identifiers) for clients determined to have significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing. Clients determined by USHS Program Manager to have severe service needs will be invited to submit a complete USHS file.

Adopted: June 2018

Procedure Name: System Prioritization

Policy:

All Prospective Applicants will be prioritized for potential housing placement in their respective eligibility pools, prior to referral to the Housing Provider. USHS uses the order of priority outlined in HUD Notice CPD-16-11 issued July 25, 2016. All PSH units serving the homeless population are dedicated to individuals and families meeting the chronic homeless definition. Individuals and families with a disability and experiencing chronic homelessness, with the longest history of homelessness and the most severe service needs, are given first priority in all PSH projects.

This process was created to allow PSH to target individuals with the greatest barriers toward obtaining and maintaining housing on their own, and not on a first come, first serve basis. Individuals and families experiencing chronic homelessness will have priority over non-chronically homeless individuals and families, as defined in HUD Notice CPD-16-11. The purpose of a prioritized pool is to ensure that:

- Chronically homeless Prospective Applicants are prioritized in the USHS process.
- The most vulnerable Prospective Applicants receive a higher score, ensuring that they are housed within their category in order of need.
- All Prospective Applicants receive an equal opportunity for housing consideration based on their eligibility and service needs.

Procedures:

The USHS Program Manager will sort each Prospective Applicant into one of the following pools:

1. **Homeless Pools** (Prospective Applicants who are literally homeless residing in a place not meant for human habitation, a safe haven, or an emergency shelter):
 - a. Chronically homeless households without children
 - b. Chronically homeless households with children
 - c. Non-chronically homeless households without children
 - d. Non-chronically homeless households with children
2. **Non-Homeless Pool** (ADAMH, Veterans and Medical Choice Prospective Applicants who are not literally homeless):
 - a. Non-homeless households without children
 - b. Non-homeless households with children

USHS Chronically Homeless and Non-Chronically Homeless Prioritization

The USHS Program Manager will sort chronically homeless Prospective Applicants into a separate pool and by household type (per above), which will be prioritized in accordance with HUD Notice CPD-16-11, Section III. A. USHS will prioritize chronically homeless households for all vacant PSH beds, regardless of whether those beds are dedicated or prioritized for the chronically homeless population.

Priority Order

1. Chronically Homeless Persons.

- a. Is eligible for USHS PSH dedicated for people who are homeless and is currently residing in a place not meant for human habitation, a safe haven, or in an emergency shelter,
- b. Qualifies as chronically homeless,
- c. Prioritization within this category: Higher priority is given to chronically homeless persons with the **longest history of homelessness** and the **most severe service needs**, based on the combined score of both length of time homeless and service needs on the Columbus Severity of Service Needs Assessment.

If there are no chronically homeless individuals in the Columbus and Franklin County CoC geographic area, the USHS Program Manager will sort non-chronically homeless Prospective Applicants into the following prioritization pools in accord with HUD Notice CPD-16-11 Section III. B. Within each prioritization pool, Prospective Applicants with the **longest history of homelessness** and the **most severe service needs** will be prioritized, based on the combined score of both length of time homeless and service needs on the Columbus Severity of Service Needs Assessment.

2. Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs. An individual or family that:

- a. Is eligible for USHS PSH dedicated for people who are homeless and is currently residing in a place not meant for human habitation, a safe haven, or in an emergency shelter,
- b. Does not qualify as chronically homeless (Priority 1),
- c. Has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months, *and*
- d. Has been identified as having severe service needs, based on meeting or exceeding a minimum score on the Columbus Severity of Service Needs Assessment.

3. Homeless Individuals and Families with a Disability with Severe Service Needs. An individual or family that:

- a. Is eligible for USHS PSH dedicated for people who are homeless and is currently residing in a place not meant for human habitation, a safe haven, or in an emergency shelter,

- b. Does not qualify as chronically homeless or have long periods of episodic homelessness (Priorities 1 or 2),
 - c. Has been identified as having severe service needs, based on meeting or exceeding a minimum score on the Columbus Severity of Service Needs Assessment.
4. **Homeless Individuals and Families with a Disability without Severe Service Needs.**
An individual or family that:
- a. Is eligible for USHS PSH dedicated for people who are homeless and is currently residing in a place not meant for human habitation, a safe haven, or in an emergency shelter,
 - b. Does not qualify as chronically homeless or have long periods of episodic homelessness (Priorities 1 or 2), and
 - c. Has not been identified as having severe service needs, based on not meeting or exceeding a minimum score on the Columbus Severity of Service Needs Assessment.
5. **Homeless Individuals and Families with a Disability Coming from Transitional Housing.** An individual or family that:
- a. Is eligible for USHS PSH dedicated for people who are homeless and is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Non-Homeless Prospective Applicant Prioritization

- a. Non-Homeless Prospective Applicants with a disability will not be scored by the USHS Program Manager when the Housing Provider is exclusively filling vacancies designated for non-homeless, medical or ADAMH units.
- b. Non-Homeless Prospective Applicants will be prioritized depending on Housing Provider. For those units, the Housing Provider will ensure that the USHS Program Manager has sufficient Prospective Applicants to fill available units.
- c. ADAMH Prospective Applicants who are currently residing in residential ADAMH housing will be prioritized by residential length of stay and any other prioritization method that the sponsor for these units prefers to use.

Severity of Service Needs and Length of Time Homeless Assessment

- a. Severity of service needs and length of time homeless are assessed through the standardized Columbus Severity of Service Needs Assessment. All homeless single adults are required to have a Columbus Severity of Service Needs Assessment as part of the Prospective Applicant File in order to be considered a complete file.

- b. The USHS Program Manager will evaluate Prospective Applicants' Columbus Severity of Service Needs Assessment results when allotting each Prospective Applicant a score for severity of service needs and length of time homeless. The USHS Program Manager will score the Columbus Severity of Service Needs Assessment and will assign a score for each Prospective Applicant.
- c. Prospective Applicant's total scores will be a combination of service utilization (when available), service needs, and length of time homeless.
- d. In the event that two or more homeless households are identically prioritized for referral to the next available unit, and each household is also eligible for referral to that unit, the USHS Program Manager should refer the household that first presented for services in the next available unit.

Adopted: July 2011
Revised: June 2018

Procedure Name: Refreshing the Eligible Pool

Policy:

Eligible pools will be refreshed monthly and more frequently if needed (if the eligible pools are exhausted) during a new project lease-up. All Prospective Applicant Files will be maintained by the USHS Program Manager after submission to USHS. Prospective Applicant information will be updated as necessary.

Procedures:

The USHS Program Manager will refresh the eligible pool by:

1. Sorting Prospective Applicants into relevant eligible pools based on Prospective Applicant eligibility (monthly and if the pools are exhausted, then weekly).
2. Scoring Prospective Applicants and prioritizing them based on the Prospective Applicant Matching & System Prioritization procedure (monthly and, if the pools are exhausted, then as needed).
3. The pools will be established by the last business day of the month to be used to fill vacancies in the upcoming month. If the pools are exhausted, this process may occur as needed.

Adopted: March 2010

Revised: April 2022

Procedure Name: USHS Referral to Housing Provider

Policy:

The USHS Program Manager will send potentially eligible Prospective Applicants to the Housing Provider from the maintained eligibility pools. Additional requests for Prospective Applicant files will be sent to Provider Agencies, as necessary to prepare for lease up.

Procedures:

1. For homeless units, the USHS Program Manager will first look up the Prospective Applicant's information in the HMIS database. If Prospective Applicant meets the current homelessness requirements for the unit, the USHS Program Manager will contact the Prospective Applicant's Provider Agency to determine if the Prospective Applicant is still in need of housing and wishes to move to the open unit.
2. For non-homeless units, the USHS Program Manager will contact Prospective Applicant's Provider Agency to determine if the Prospective Applicant is still in need of housing and wishes to move to the open unit.
3. After establishing Prospective Applicant's interest, the USHS Program Manager will request updated documentation as necessary.
4. The USHS Program Manager will run a credit check with FABCO.
5. The USHS Program Manager will verify that Prospective Applicant File contains a printout from ODJFS, court documentation, school records or proof of pregnancy for family units. This documentation is used to verify or confirm household composition. If the Head of Household is listed as the biological mother or father, and no other documents are available, the Head of Household may sign a sworn affidavit to attest the child is a member of the household.
6. The USHS Program Manager will make a copy of the Prospective Applicant File and forward the original file to the Housing Provider.

Adopted: March 2010

Revised: March 2021

Procedure Name: Housing Referrals for Incomplete Files Exception

Policy:

The USHS Program Manager will refer incomplete Prospective Applicant files to a Housing Provider when he/she has exhausted the Eligible USHS Pool and with the agreement of the Housing Provider.

Procedures:

The USHS Program Manager will refer an incomplete Prospective Applicant file to a Housing Provider with the agreement that the Housing Provider will work with the Prospective Applicant to meet the following requirements:

1. Housing Provider and Prospective Applicant agree to provide/assist in the process to secure required documents and identifying documentation. Those documents include but are not limited to:
 - a. Driver's License, Government issued Photo ID or Passport
 - b. Social Security card
 - c. Birth Certificate or DD-214 (Veterans)
2. An incomplete Prospective Applicant file will only be referred to housing if the missing documentation has already been requested by the Prospective Applicant and Provider Agency.
3. All identifying documents or other required documentation must be received within 90 days of Prospective Applicant's housing move-in date.
4. If all required documentation or identifying documents are not received within 90 days of Prospective Applicant's housing move-in date, Prospective Applicant will be asked to leave the premises and forfeit their housing.

Adopted: March 2021

Procedure Name: Vacancy Management or Lease up

Policy:

The USHS Program Manager will send Prospective Applicants to the Housing Provider for identified vacancies.

Procedures:

1. The USHS Program Manager will fill vacancies by utilizing the prioritized pool.
2. USHS Program Manager will identify the highest prioritized Prospective Applicant from the chronically homeless and non-chronically homeless eligibility pools and forward the file to the Housing Provider.
3. The USHS Program Manager will notify the Provider Agency informing it that its Prospective Applicant was forwarded to the Housing Provider.
4. After the file(s) are given to the Housing Provider to fill the vacancy, the Housing Provider will manage all contact with Prospective Applicant and Provider Agency.
5. The Housing Provider will contact each Prospective Applicant to coordinate placement at the housing project and schedule an interview with the Prospective Applicant.
6. The Housing Provider will interview Prospective Applicant referred from USHS and complete eligibility verification according to Housing Provider's Tenant Selection Plan.
7. Final determination of the Prospective Applicant's situation (approved or not approved) should occur no later than thirty (30) days from the date that the Prospective Applicant File was forwarded to the Housing Provider. If the Housing Provider does not resolve the situation within thirty (30) days, it will notify the USHS Program Manager and Provider Agency within two (2) days of missed move-in date.
8. The Housing Provider and Provider Agency will directly communicate with the Prospective Applicant in terms of his/her housing application status once the application has been moved forward by the USHS Program Manager.
9. USHS Program Manager will run a report in HMIS to see if Prospective Applicants have been successfully housed. USHS Program Manager will follow up on any outstanding referrals over the 30 day goal.

Vacancy Management Timeline:

1. Upon receipt of Prospective Applicant File, the USHS Program Manager will check the file for completeness. Provider Agencies will be notified by the USHS Program Manager if the submitted file is incomplete. Provider Agencies will be asked to retrieve the Prospective Applicant File within five (5) business days. If Provider Agency fails to retrieve the incomplete files within this time frame, the incomplete file will be shredded. Completed files may be resubmitted at any time.
2. The USHS Program Manager will complete a criminal background check on all chronically homeless Prospective Applicants within two (2) business days of receiving appropriate vacancy for Prospective Applicant. The USHS Program Manager will complete criminal background check for USHS Non-Homeless special populations including Veterans, ADAMH, Medical, and Disabled/Non-Homeless within two (2) business days of receiving appropriate vacancy for Prospective Applicant. The USHS Program Manager will complete background checks for Homeless Prospective Applicants before referring a file to the Housing Provider.
3. If, during the determination of eligibility, the USHS Program Manager finds that a Prospective Applicant is unlikely to receive placement within USHS units, the USHS Program Manager will send the Provider Agency a written "Notification of Incompatibility" within two (2) business days of such finding. The Provider Agency will inform the Prospective Applicant within two (2) business days of receipt of such notification from the USHS Program Manager.
4. If a potential vacancy has been identified, the Housing Provider will notify USHS of the vacancy within one (1) business day. Notification will occur to the USHS Program Manager using the USHS Unit Vacancy Notification Google Form.
5. USHS Program Manager will identify the highest prioritized Prospective Applicant from the eligible pool and forward that name to the Housing Provider. If two (2) or more Prospective Applicants have the same, highest priority within the appropriate pool, the USHS Program Manager will refer the Prospective Applicant file that was completed first to the Housing Provider.
6. The prioritization occurs as outlined in the Prospective Applicant Identification and System Prioritization procedures. The USHS Program Manager will attempt to fill the vacancy within two (2) business days. If Prospective Applicants cannot be located within the time frame, USHS will notify the Housing Provider of this delay within two (2) business days of the receipt of the Unit Vacancy Notification Form.
7. After transferring Prospective Applicant File(s) to the Housing Provider, the USHS Program Manager will send an email to the Prospective Applicant's Provider Agency informing it of the transfer. At this point, the Housing Provider will manage all contact with Provider Agencies and Prospective Applicant(s).
8. The Housing Provider will contact each Prospective Applicant received from USHS within two (2) business days of notification and schedule an interview.

9. The Housing Provider will interview Prospective Applicants referred from USHS and complete eligibility verification according to Housing Provider's Tenant Selection Plan within ten (10) business days of receipt of Prospective Applicant Files from the USHS Program Manager.
10. Final determination of the Prospective Applicant's situation (approved or not approved) has a goal of thirty (30) days from the date that the Prospective Applicant File was forwarded to the Housing Provider. If the Housing Provider does not resolve the situation within thirty (30) days, it will notify the USHS Program Manager and Provider Agency within two (2) days of missed move-in date.
11. If the Housing Provider denies the Prospective Applicant (e.g., for reason described in its Tenant Selection Plan), the Housing Provider must notify the Prospective Applicant and the Prospective Applicant's last known Provider Agency and provide an explanation in writing to the USHS Program Manager within two (2) business days of the date of the denial.
12. If the Prospective Applicant refuses the Housing Provider's unit for any reason, the Housing Provider will notify the Prospective Applicant's last known Provider Agency and provide an explanation in writing to the USHS Program Manager within two (2) business days of the date of refusal.
13. USHS will provide another Prospective Applicant to the Housing Provider within two (2) business days of receipt of Housing Provider's explanation for denial or refusal of the previously referred Prospective Applicant. The process will repeat beginning with step #6.

Lease up Timeline:

1. Six months prior to the intended start of a lease-up project, USHS will host a Project Planning Meeting with all agencies involved in the management and funding of the project. During that meeting the Housing Provider will notify those in attendance of the upcoming availability of units, the unit types, subsidy type, eligibility criteria and the amount of available units. USHS will request additional referrals into the eligible pools to provide referrals to the Housing Provider for lease up.
2. The USHS Program Manager, in consultation with the Housing Provider, will create a schedule for referrals. The schedule will meet the Housing Provider's lease-up timeframe and minimize the time homeless households referred to the project wait for housing.
3. USHS will refer eligible Prospective Applicants to the Housing Provider to fill each unit within the Housing Provider's housing project within the planned lease-up timeframe and according to the Tenant Selection Plan.
4. The Housing Provider will request replacement files for Prospective Applicants who refuse, are denied, no longer eligible or are unable to be located as needed.
5. The Housing Provider will enter all move-ins into HMIS in a timely manner.

Adopted: March 2010

Revised: April 2022

Procedure Name: Housing Provider Rejection of Prospective Applicant

Policy:

Housing Providers may deny an eligible Prospective Applicant for any legally permissible reason as outlined in the Housing Provider's Tenant Selection Plan. Prospective Applicants have the right to appeal this denial to the Housing Provider. A Prospective Applicant's denial from placement at one housing site will not preclude the Prospective Applicant from receiving any other housing unit through USHS. Denial from housing will have no disparaging effect on the Prospective Applicant's ability to receive other housing.

Procedures:

1. Housing Providers may deny an eligible Prospective Applicant for any legally permissible reason as outlined in the Housing Provider's Tenant Selection Plan. Housing Provider will return the Prospective Applicant File and a written explanation for this denial to the USHS Program Manager within two (2) days.
2. Prospective Applicants have a right to appeal Housing Provider denial by following the Housing Provider's guidelines for appeals.
3. When a Prospective Applicant is denied, the USHS Program Manager will submit another eligible Prospective Applicant File to the Housing Provider to be considered for the vacant unit.

Adopted: June 2011

Revised: March 2017

Procedure Name: Prospective Applicant Rejection of Housing

Policy:

Prospective Applicants are given up to two (2) opportunities to accept a housing opportunity. The selection of a Prospective Applicant from the pool for referral is based on prioritization and eligibility for the available unit. Each opportunity will be for a safe, decent, sanitary and affordable housing unit in good repair with access to supportive services.¹⁴

The Prospective Applicant is expected to tour housing project or unit before rejection of available unit. If a Prospective Applicant rejects two (2) housing opportunities, he or she will be ineligible for USHS housing for one (1) calendar year. At this time, his or her Provider Agency will continue to seek an appropriate non-USHS housing opportunity.

Procedures:

1. If the Prospective Applicant rejects housing, the Housing Provider will return the Prospective Applicant File and a written explanation for this rejection to the USHS Program Manager within two (2) days of rejection.
2. Prospective Applicants have a right to appeal exclusion from the USHS pool.¹⁵

Adopted: June 2011

Revised: December 2016

¹⁴ Additional unit selection considerations will be made only for reasons found in Section G: Housing Accommodations.

¹⁵ See Section O: Appeal for Re-entry into the USHS Pool following Prospective Applicant's Rejection of Housing Opportunity.

Procedure Name: Documentation of Homelessness

Policy:

The Prospective Applicant must be literally homeless at time of application, if applying for homeless housing units. An individual or family is literally homeless if they live or reside in a place not meant for human habitation or an emergency shelter or if they are exiting an institution where they resided for 90 days or less and they resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Procedures:

1. Evidence of Homeless Status

Evidence of an individual or head of household's current living situation may be documented by:

- a. For individuals or families in emergency shelter, transitional housing (GPD), are actively enrolled in Rapid Re-Housing: HMIS data. Please note that clients enrolled in a Rapid Re-Housing program maintain their homeless status regardless of current residence, but do not accrue homeless time unless they are verifiably homeless.
- b. For unsheltered individuals or families: a written observation by an approved outreach worker on a Verification of Street Homelessness form that documents that the Prospective Applicant is currently unsheltered.
- c. For individuals leaving an institutional care facility: exit paperwork from the institution clearly documenting entry, admission and exit/discharge dates AND documentation of literal homeless status (per above) immediately prior to admission into the institutional care facility
- d. For individuals and families residing at CHOICES: residency letter on agency letterhead clearly documenting entry and current stay.

Prospective Applicants must be literally homeless, and this status must be verified at the following points in the housing process through the USHS:

- At the time the Prospective Applicant File is submitted to the USHS.
- At time of USHS Referral.
- At Housing Provider Program Entry.
- At lease signing with the Housing Provider.

2. Evidence of Homelessness Duration

The duration of homelessness is necessary to determine if the Prospective Applicant is chronically homeless or non-chronically homeless for the purposes of housing prioritization. There must be documentation to establish duration of homeless. Evidence of duration of homelessness can be documented in the following ways:

- a. Print out of HMIS data; and/or
- b. For Prospective Applicants' currently experiencing street homeless, a written observation by an approved outreach worker must be completed monthly to document ongoing street homelessness. The Outreach Worker must physically see the Prospective Applicant living in a place not meant for human habitation at least once during the month, in order to document for that month. This observation may be documented on a Verification of Street Homelessness form.

A single documented encounter with an outreach Provider Agency on a single day within one month is sufficient to consider an individual or family as homeless for the entire month unless there is any evidence that the household has had a break in homeless status during that month (e.g., evidence in HMIS of a stay in transitional housing). Approved outreach workers must acknowledge any known gaps in street homelessness including entry into shelter, transitional housing or housing. They should not utilize Verification of Street Homelessness form to cover occasions where the Prospective Applicant was not experiencing street homelessness.

Adopted: October 2014

Revised: August 2017

Procedure Name: Documentation of a Certified Disability

Policy:

Prospective Applicants must provide documentation of a certified disability. Certification of Disability documentation must include one of the following:

- a. Written verification by a professional licensed by the state to diagnose AND treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently. Certification of Disability forms do not expire.
- b. Written verification from the Social Security Administration, or the receipt of a disability check (e.g., Social Security Insurance check or Veteran Disability Compensation).¹⁶
- c. In certain exceptional situations CSB can authorize intake use of staff-recorded observation of disability to document disability status as long as the disability is confirmed by the aforementioned evidence within 45 days of the application for assistance. This is done only with CSB's prior approval.

Procedures:

1. Written verification from a professional who is licensed by the state to diagnose AND treat that condition which includes, a physician, advanced nurse practitioner (CNP or CNS), or a state licensed clinician. State licensed clinicians must be independently licensed by the Ohio Counselor, Social Worker and Marriage and Family Therapist Board and can include counselors and/or social workers (LPCC/PCC, LICDC, or LISW).
2. For CMHA housing, disability based solely on any drug or alcohol dependence is not acceptable.

Adopted: March 2010

Revised: February 2021

¹⁶ This doesn't include Survivor's Benefits or Social Security Retirement

Procedure Name: Transfers between Programs

Policy:

Current PSH tenants within units managed by USHS are able to transfer to other PSH units within USHS, only when a documented tenant need presents. The tenant is required to meet any other eligibility criteria or preferences for the housing project they transfer to. The tenant shall retain their original homeless or chronically homeless status for the purposes of the transfer.

Moving a tenant from a more service-intensive 24/7 program to a less structured or sober housing model is cost effective for the system. It allows for a more vulnerable individual to be placed in an intensive PSH unit while moving an individual in recovery to a less intensive or structured environment.

When a Provider Agency accepts a transfer from another PSH project, it must keep records on file demonstrating that the tenant:

1. Is transferring from another PSH project;
2. The reason for the transfer; and
3. Met the eligibility requirements for PSH prior to entering the original PSH project. The USHS Program Manager will decide on the tenant's eligibility for housing based on the available vacancies and tenant need.

Procedures:

1. Tenants wishing to transfer from one project to another have to meet the eligibility criteria for the specific program/unit. This eligibility will be checked by the USHS Program Manager. The USHS Program Manager will decide on the tenant's eligibility for housing based on the available vacancies and tenant need.
2. Tenants may be able to transfer from a homeless unit to a non-homeless unit or another homeless unit within USHS. PSH projects may serve individuals and families from other PSH projects who met the eligibility requirements for permanent housing if the program participants were eligible for the original PSH and this eligibility is documented. It is not necessary for clients moving from a homeless unit to a non-homeless unit to complete the transfer process via USHS. The transfer must be documented in HMIS.
3. Housing Provider must show that the proposed move is based on the emergent need of and for the benefit of the tenant and keeps in line with their Individual Housing Stabilization Plans and would allow the tenant to achieve more independence.
4. All requests for project transfers must be submitted to USHS for eligibility checks and transfer prioritization. Transfer requests will be prioritized after Prospective

Applicants identified as homeless individuals with severe service needs, unless the request is an emergency VAWA transfer request. The transfer request submission will include, documentation needed to sustain eligibility, per the USHS procedure above. It is not necessary for clients moving from one homeless unit to another homeless unit within the same project to complete the transfer process via USHS.

5. In the case of the elimination of a housing project due to reallocation of funds or other reasons, the Housing Provider must work with tenants to identify alternate placements or work on housing stability and exit plans that will help tenants prepare to exit by the PSH project's closing.
6. If the PSH unit is no longer appropriate for the household size or household composition due to the birth of a child, permanent return of child to a parent or family reunification, the Housing Provider should consider transferring the tenant to another PSH unit within USHS that addresses the tenant's housing and service needs.

HUD doesn't consider two people in a one-bedroom unit to be "overcrowded." Therefore, if the tenant continues to meet all other eligibility criteria for residing in a one-bedroom unit and wishes to continue to reside there, then the tenant may continue to stay.

7. Housing Provider will follow lease terms for tenant deposit refund upon tenant transfer.
8. Tenant will receive deposit refund, in accordance with lease terms. Tenant is ultimately responsible for using deposit refund and/or personal funds to pay deposit to new Housing Provider and any move-related expenses. DCA funds cannot be utilized for this purpose.

Adopted: May 2011

Revised: February 2021

HUD Guidance Received 2014

Procedure Name: Emergency Transfer for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

In accordance with the Violence Against Women Act (VAWA), current PSH tenants within CoC and other HUD programs who are victims of domestic violence, dating violence, sexual assault, or stalking are allowed to request an emergency transfer from the tenant's current unit to another unit.

A PSH tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if:

1. The PSH tenant reasonably believes that there is a threat of imminent harm from further violence if the PSH tenant remains within the same unit.
2. The PSH tenant is a victim of sexual assault, the PSH tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.
3. The PSH tenant expressly requests the transfer in accordance with the procedures described.

PSH tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.

The ability of the USHS housing provider to honor such request for PSH tenants currently receiving assistance, however, may depend upon,

1. A preliminary determination that the PSH tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and
2. On whether PSH has another dwelling unit that is available and is safe to offer the PSH tenant for temporary or more permanent occupancy.

This procedure identifies PSH tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This procedure is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that USHS is in compliance with VAWA.

Procedures

1. The housing provider must provide to each of its applicants and to each of its tenants the notice of occupancy rights and the certification form at each of the following times:
 - (i) At the time the applicant is denied assistance or admission under a covered housing program;
 - (ii) At the time the individual is provided assistance or admission under the covered housing program;

- (iii) With any notification of eviction or notification of termination of assistance;
and
 - (iv) During the 12-month period following December 16, 2016, either during the annual recertification or lease renewal process, whichever is applicable, or, if there will be no recertification or lease renewal for a tenant during the first year after the rule takes effect, through other means.
2. The individual or family shall not be required to meet any other eligibility criteria or preferences for the project. The individual or family shall retain their original homeless or chronically homeless status for the purposes of the transfer.
 3. The PSH tenant shall notify USHS housing provider's management office and submit a written request for a transfer.
 4. The USHS housing provider will provide reasonable accommodations to this policy for individuals with disabilities.
 5. The PSH tenant's written request for an emergency transfer should include either:
 - a. A statement expressing that the PSH tenant reasonably believes that there is a threat of imminent harm from further violence if the PSH tenant were to remain in the same dwelling unit assisted under the USHS Housing Provider's program;
OR
 - b. A statement that the PSH tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the PSH tenant's request for an emergency transfer.
 6. USHS housing provider will keep confidential any information that the PSH tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the PSH tenant gives USHS housing provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the PSH tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the PSH tenant.
 7. USHS housing provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. USHS housing provider will, however, act as quickly as possible to move a PSH tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a PSH tenant reasonably believes a proposed transfer would not be safe, the PSH tenant may request a transfer to a different unit.
 8. If a unit is available, the transferred PSH tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the PSH tenant has been

transferred. The USHS housing provider may be unable to transfer a PSH tenant to a particular unit if the PSH tenant has not or cannot establish eligibility for that unit.

9. If the USHS housing provider has no safe and available units for which a PSH tenant who needs an emergency is eligible, The USHS housing provider will assist the PSH tenant in identifying other housing providers who may have safe and available units to which the PSH tenant could move.
10. At the PSH tenant's request, the USHS housing provider will also assist PSH tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.
11. Pending processing of the transfer and the actual transfer, if it is approved and occurs, the PSH tenant is urged to take all reasonable precautions to be safe.
12. PSH tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).
13. PSH tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://hotline.rainn.org/online/>
14. PSH tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center.>
15. Copies of the following documents can be found by clicking the hyperlinks:
 - [Notice of Occupancy Rights Under the Violence Against Women Act \(12/2016\)](#)
 - [Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking \(12/2016\)](#)
 - [Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation \(12/2016\)](#)
 - [Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking \(12/2016\)](#)

Adopted: June 2018

Procedure Name: Temporary Relocation¹⁷

Policy:

Permanent Supportive Housing Providers participating in the USHS should take all reasonable steps to minimize the displacement of tenants. Current tenants within units managed by USHS, who are required to move temporarily, must be offered relocation assistance in accord with federal Uniform Relocation Act requirements, as applicable. Tenants required to relocate temporarily must be offered a decent, safe and sanitary unit in the same building or complex (single sites) or in a comparable unit in the same geographic area (scattered sites) with comparable supportive services.

Procedures:

When a PSH project has to temporarily relocate a tenant they must:

1. Cover the cost for all reasonable expenses incurred in connection with the temporary relocation, including moving costs, increases in monthly rent/occupancy changes and utility cost as applicable; and
2. Appropriate advisory services, including reasonable advance written notice of:
 - a. The date and approximate duration of the temporary relocation;
 - b. The location of the suitable, decent, safe and sanitary dwelling to be made available for the temporary period.
 - c. The reasonable terms and conditions under which the program participant will be able to occupy the temporary unit return to his/her initial housing unit and timing of return;
3. Provide the tenant with access to similar service supports as those available prior to relocation.
4. Notify Community Shelter Board in writing as soon as they are aware of the necessity of temporary relocation and provide housing updates including the reason for and date of temporary relocation, the location of the temporary unit and date tenant will be able to return to the permanent unit.
5. Maintain records that established policies & procedures were met.

Adopted: February 2017
HUD Guidance Received 2017

¹⁷ Please refer to 42 USC Ch. 61: UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES FOR FEDERAL AND FEDERALLY ASSISTED PROGRAMS

Procedure Name: Permanent Displacement¹⁸

Policy:

A “displaced person” is any person that moves permanently, as a direct result of acquisition, rehabilitation, or demolition of a housing project. This includes any permanent involuntary move where the tenant is not eligible to return to a housing project through no fault of their own. For Example: If the owner issues a notice to move permanently from the property, or refuses to renew an expiring lease.

PSH Providers participating in the USHS should take all reasonable steps to minimize the displacement of tenants. Current PSH tenants within units managed by USHS, who are required to permanently relocate, must be offered relocation assistance.¹⁹ Tenants permanently displaced must be offered decent, safe and sanitary comparable housing options and comparable supportive services. Any tenant who has been temporarily relocated for a period beyond one year must be treated as permanently displaced and offered relocation assistance.

A tenant does not qualify as a “displaced person” if the person has been evicted for serious or repeated violation of the terms and conditions of the lease/occupancy agreement.

Procedures:

When a PSH project must permanently displace a tenant they must:

1. Cover the cost for all reasonable expenses incurred in connection with the permanent displacement, including moving costs, increases in monthly rent/occupancy changes and utility cost; as applicable.
2. Appropriate advisory services, including reasonable advance written notice of:
 - a. The date of the permanent relocation;
 - b. The location of the decent, safe and sanitary comparable housing options available;
 - c. The reasonable terms and conditions under which the tenant will be able to occupy the unit selected.
3. Provide the tenant with up to two (2) housing options which are decent, safe and sanitary and comparable to the tenant’s current unit. A transfer application may be submitted to USHS if the permanent displacement is not time sensitive. If the tenant refuses 2 opportunities they will then be advised on alternative housing options outside of the PSH inventory.

¹⁸ Refer to 42 USC Ch. 61: UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES FOR FEDERAL AND FEDERALLY ASSISTED PROGRAMS

¹⁹ See Procedure Name: Transfers between Programs, for guidance on transfers.

4. Provide the tenant with access to similar service supports as those available prior to permanent relocation.
5. Notify Community Shelter Board in writing as soon as they are aware of the necessity of permanent displacement and provide housing status updates including the reason for & date of permanent displacement and the location & move-in date of the comparable unit. Ongoing updates may be required if the tenant requires temporary placement (i.e. in a hotel) while waiting for the availability of a permanent unit.
6. Maintain records that established policies & procedures were met.

Whenever possible:

7. Minority persons must be given reasonable opportunities to relocate to units not located in an area of minority concentration and within their financial means.

Adopted: February 2017
HUD Guidance Received 2017

Procedure Name: Absences from Units and Tenant Termination

Policy:

PSH Providers participating in the USHS should have a termination policy and practice of providing written plans for at-risk tenants that includes strategies for intervention, prevention, or housing retention that help tenants avoid losing housing. PSH providers should have clear policies and procedures in place regarding absences from units and participant termination. Terminations from PSH follow eviction procedures consistent with the Ohio Revised Code, applicable Ohio Landlord-Tenant law and CSB HEARTH Operating Policies and Procedures.

Procedures:

When a tenant leaves a CoC program-funded unit:

1. For a Rental Assistance unit only, if a unit is vacated before the expiration of the lease, the assistance for the unit may continue for a maximum of 30 days from the end of the month in which the unit was vacated, unless occupied by another eligible person.
2. For a Rental Assistance unit no additional assistance will be paid until the unit is occupied by another eligible person. For a leasing assistance unit the lease is between the Housing Provider and the owner of the property and the Housing Provider is required to make payments on a unit in compliance with the lease, regardless of whether the PSH Provider has housed a USHS referred tenant in the unit or structure.
3. Brief periods of stay in institutions (such as jail, hospital, etc.), of less than 90 days are not considered vacancies. Tenants should continue to receive rental assistance during this time and not be terminated. Once a person resides at an institution for more than 90 days, they are no longer eligible for rental assistance. The Housing Provider should notify USHS to fill the unit with another eligible household.
4. Housing Provider will maintain documentation of:
 - a. The date of unit vacancy.
 - b. Documentation of any tenant intervention, prevention or housing retention utilized before termination.
 - c. Documentation of any tenant hearings or appeals.
 - d. Documentation of institutional stays of less than 90 days.

Adopted: March 2017

HUD Guidance Received 2017

Updated: June 2018

Appendix 1

Drug Related or Violent Criminal Offenses:

Drug Related Offenses: A violation of section,
2925.02 Corrupting another with drugs.
2925.03 Trafficking, aggravated trafficking in drugs.
2925.04 Illegal manufacture of drugs - illegal cultivation of marihuana -
methamphetamine offenses.
2925.041 Illegal assembly or possession of chemicals for manufacture of drugs.
2925.05 Funding, aggravated funding of drug or marihuana trafficking.
2925.06 Illegal administration or distribution of anabolic steroids.
2925.09 Unapproved drugs - dangerous drug offenses involving livestock.
2925.11 Possession of controlled substances.
2925.12 Possessing drug abuse instruments.
2925.13 Permitting drug abuse.
2925.14 Illegal use or possession of drug paraphernalia.
2925.141 Illegal use or possession of marihuana drug paraphernalia.
2925.22 Deception to obtain a dangerous drug.
2925.23 Illegal processing of drug documents.
2925.24 Tampering with drugs.
2925.31 Abusing harmful intoxicants.
2925.32 Trafficking in harmful intoxicants - improperly dispensing or distributing nitrous
oxide.
2925.33 Possessing nitrous oxide in motor vehicle.
2925.34 Sale of pure caffeine product.
2925.36 Illegal dispensing of drug samples.
2925.37 Counterfeit controlled substance offenses.

Violent Criminal Offenses: A violation of section,

2903.01 Aggravated Murder
2903.02 Murder
2903.03 Voluntary Manslaughter
2903.04 Involuntary Manslaughter
2903.11 Felonious Assault
2903.12 Aggravated Assault
2903.13 Assault
2903.15 Permitting Child Abuse
2903.21 Aggravated Menacing
2903.211 Menacing by Stalking
2903.22 Menacing
2905.01 Kidnapping
2905.02 Abduction
2905.11 Extortion
2905.32 Trafficking in Persons
2907.02 Rape
2907.03 Sexual Battery
2907.05 Gross Sexual Imposition

2909.02 Aggravated Arson
2909.03 Arson
2909.24 Terrorism
2911.01 Aggravated Robbery
2911.02 Robbery
2911.11 Aggravated Burglary
2917.01 Inciting to Violence
2917.02 Aggravated Riot
2917.03 Riot
2917.31 Inducing Panic
2919.25 Domestic Violence
2921.03 Intimidation
2921.04 Intimidation of Attorney, Victim or Witness in Criminal Case or Delinquent Child
Action Proceeding
2921.34 Escape or
2923.161 Improperly Discharging Firearm at or into a Habitation, in a School Safety
Zone or with Intent to Cause Harm or Panic to Persons in a School Building or at a
School Function, of division (A)(1), (2), or (3) of section 2911.12 Burglary, or of division
(B)(1), (2), (3), or (4) of section 2919.22 Endangering Children of the Revised Code

Appendix 2

Noncitizens:

1. A noncitizen with eligible immigration status in the category below:
 - i. A noncitizen lawfully admitted for permanent residence.
 - ii. A noncitizen who entered the US before January 1, 1972 and has continuously maintained residence in the US since then, and who is not eligible for citizenship, but is deemed to be lawfully admitted for permanent residence.
 - iii. A noncitizen who is lawfully present in the US pursuant to the granting of asylum (which has not been terminated).
 - iv. A noncitizen who is lawfully present in the US as a result of an exercise of discretion by the Attorney General.
 - v. A noncitizen who is lawfully present in the US as a result of the Attorney General's withholding deportation.
 - vi. A noncitizen lawfully admitted for temporary or permanent residence due to amnesty granted.

2. Documentation of eligible immigration status;

Admitted as Refugee Pursuant to section 207:

- i. "Section 208" or "Asylum",
- ii. "Deportation Stayed",
- iii. Paroled Pursuant to Sec. 212(d)(5) of the INA, or
- iv. Accompanied by one of the following documents: A final court decision granting asylum (but only if no appeal is taken); A letter from an INS asylum officer granting asylum (if application is filed on or after October 1, 1990) or from an INS district director grant asylum (if application filed before October 1, 1990); A court decision granting withholding or deportation; or a letter from an INS asylum officer granting withholding of deportation (if application filed on or after October 1, 1990).
- v. Form I-688, Temporary Resident Card, which must be annotated "section 245A" or "section 210"; or
- vi. Form I-688B, Employment Authorization Card, which must be annotated "Provision of Law 274a.12(11)" or "Provision of Law 274a.12";
- vii. A receipt issued by the INS indicating that an application for issuance of a replacement document in one of the above-listed categories has been made and the applicant's entitlement to the document has been verified.

Appendix 3

Safe, Decent and Sanitary Housing in Good Repair²⁰

These standards address the major areas of the HUD-funded housing including supportive housing for individuals with disabilities: the site; the building exterior; the building systems; the dwelling units; the common areas; and health and safety considerations.

(1) Site. The site components, such as fencing and retaining walls, grounds, lighting, mailboxes/project signs, parking lots/driveways, play areas and equipment, refuse disposal, roads, storm drainage and walkways must be free of health and safety hazards and be in good repair. The site must not be subject to material adverse conditions, such as abandoned vehicles, dangerous walks or steps, poor drainage, septic tank back-ups, sewer hazards, excess accumulations of trash, vermin or rodent infestation or fire hazards.

(2) Building exterior. Each building on the site must be structurally sound, secure, habitable, and in good repair. Each building's doors, fire escapes, foundations, lighting, roofs, walls, and windows, where applicable, must be free of health and safety hazards, operable, and in good repair.

(3) Building systems. Each building's domestic water, electrical system, elevators, emergency power, fire protection, HVAC, and sanitary system must be free of health and safety hazards, functionally adequate, operable, and in good repair.

(4) Dwelling units.

(a) Each dwelling unit within a building must be structurally sound, habitable, and in good repair. All areas and aspects of the dwelling unit (for example, the unit's bathroom, call-for-aid (if applicable), ceiling, doors, electrical systems, floors, hot water heater, HVAC (where individual units are provided), kitchen, lighting, outlets/switches, patio/porch/balcony, smoke detectors, stairs, walls, and windows) must be free of health and safety hazards, functionally adequate, operable, and in good repair.

(b) Where applicable, the dwelling unit must have hot and cold running water, including an adequate source of potable water (note for example that single room occupancy units need not contain water facilities).

(c) If the dwelling unit includes its own sanitary facility, it must be in proper operating condition, usable in privacy, and adequate for personal hygiene and the disposal of human waste.

(d) The dwelling unit must include at least one battery-operated or hardwired smoke detector, in proper working condition, on each level of the unit.

²⁰ **24 CFR 5.703** - Physical condition standards for HUD housing that is decent, safe, sanitary and in good repair (DSS/GR).

(5) Common areas. The common areas must be structurally sound, secure, and functionally adequate for the purposes intended. The basement/garage/carport, restrooms, closets, utility, mechanical, community rooms, day care, halls/corridors, stairs, kitchens, laundry rooms, office, porch, patio, balcony, and trash collection areas, if applicable, must be free of health and safety hazards, operable, and in good repair. All common area ceilings, doors, floors, HVAC, lighting, outlets/switches, smoke detectors, stairs, walls, and windows, to the extent applicable, must be free of health and safety hazards, operable, and in good repair. These standards for common areas apply, to a varying extent, to all HUD housing, but will be particularly relevant to congregate housing, independent group homes/residences, and single room occupancy units, in which the individual dwelling units (sleeping areas) do not contain kitchen and/or bathroom facilities.

(6) Health and safety concerns. All areas and components of the housing must be free of health and safety hazards. These areas include, but are not limited to, air quality, electrical hazards, elevators, emergency/fire exits, flammable materials, garbage and debris, handrail hazards, infestation, and lead-based paint. For example, the buildings must have fire exits that are not blocked and have hand rails that are undamaged and have no other observable deficiencies. The housing must have no evidence of infestation by rats, mice, or other vermin, or of garbage and debris. The housing must have no evidence of electrical hazards, natural hazards, or fire hazards. The dwelling units and common areas must have proper ventilation and be free of mold, odor (e.g., propane, natural gas, methane gas), or other observable deficiencies. The housing must comply with all requirements related to the evaluation and reduction of lead-based paint hazards and have available proper.