

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



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Narrative Manual

A. 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.

B. 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.

C. Goal

A major goal of the system is to coordinate efforts to place the most vulnerable of the community's population into housing.

D. Key Terms and Acronyms

Certification of Disability (COD) Award letter or print out from the Social Security Administration (SSA) verifying receipt of disability benefits (SSDI or SSI) or a signed Certification of Disability form.

Columbus ServicePoint Our community's homeless management information system (HMIS). Partner Agencies collect client data and enter it in this electronic database.

Housing Provider Agencies which manage housing projects within the USHS.

HUD Chronically Homeless An unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness in the past three (3) years. HUD updated the CH definition to include families – a single adult, part of a household, that meets the chronic homeless definition automatically qualifies the family as chronically homeless.

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

Non-Rebuilding Lives Household with a disabling condition. Disabled individuals may be homeless or at risk of becoming homeless including those who are exiting institutional settings (treatment programs, hospitals, nursing homes, correctional institutions). 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 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.

Prospective Applicant An individual who is literally homeless and meets eligibility guidelines for the USHS.

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, social security card or printout from the Social Security Administration verifying social security number, Vulnerability 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 Agencies working with USHS that have direct contact with Prospective Applicants such as Emergency Shelters, Outreach Providers and the Navigator Program. For ADAMH units, ADAMH 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.

Rebuilding Lives (RL) Currently homeless individual with a disabling condition who has either been homeless for at least 120 days OR has had at least four (4) episodes of homelessness. (RL) defines an eligible household as a household with a disabling condition who has a history of homelessness and is either currently homeless or is living in a direct housing/rapid re-housing unit currently supported by Community Shelter Board for at least 120 days OR has had at least four (4) episodes of homelessness.

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

Tenant Selection Plan Housing Provider's description of the eligibility requirements for admission into the housing program, including such things as income limits and exclusionary criteria. It is a policy utilized to ensure fair, consistent and equal treatment of Prospective Applicants.

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 street homelessness to be used monthly to document homeless in the absence of a Columbus ServicePoint record.

Vulnerability Assessment Standard tool used to measure severity of service needs for individuals experiencing homelessness.

Alcohol, Drug and Mental Health Board (ADAMH)	Date of Birth (DOB)	Permanent Supportive Housing (PSH)	Social Security Insurance (SSI)
Certification of Disability (COD)	Department of Housing and Urban Development (HUD)	Release of Information (ROI)	Social Security Number (SSN)
Columbus Metropolitan Housing Authority (CMHA)	Federal Adjustment Bureau, Inc. (FABCO)	Social Security Administration (SSA)	Temporary Assistance for Needy Families (TANF)
Community Shelter Board (CSB)	Ohio Department of Jobs & Family Services (ODJFS)	Social Security Disability (SSDI)	Unified Supportive Housing System (USHS)

E. General Eligibility

USHS serves single adults, couples and families, where at least one member of the household has a certified disability. These individuals may be literally homeless or transitioning out of institutional settings, such as hospitals, jails, prisons or nursing homes, where they have resided for less than 91 days and were homeless at time of admission into the institution.

Eligibility for housing is also dependent on the 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.

F. PSH Unit Eligibility Requirements

1. All USHS Units

All persons considered for placement in USHS units must meet the following eligibility, per the details below:

- a. **Disability.** Prospective Applicants must have documentation of a certified disability. The household must provide documentation that one member of the household is disabled. Two forms of documentation will be accepted: (1) Certification of Disability form signed by an Authorized (Licensed) Professional or (2) Social Security Disability Insurance (SSDI) or Social Security Insurance (SSI) printout providing proof of benefits, dated within 90 days from submission.
- b. **Proof of Identity and Social Security Number.** Prospective Applicants must have verification of each adult household member's identity. All household members 18 or older must provide a clean copy of valid government-issued photo identification or driver's license. Prospective Applicant must provide a copy of his or her social security card or SSA verification of social security number and birth certificate or letter/form requesting birth certificate for each household member including dependents under the age of 18.
- c. **Household Composition.** Prospective Applicants must have verification of household information. All Prospective Applicant households must have a printout from the ODJFS, regardless of current benefit status. This printout is documentation of household composition.
- d. **Income Documentation.** All Prospective Applicants must have verification of income. All adults in the Prospective Applicant's household must provide proof of receipt of benefits which may include, but are not limited to: wages from employment, veterans' benefits, SSI, SSDI, unemployment, general public assistance, gift income, child support, alimony, food stamps, Medicaid, Medicare, pensions, TANF, or worker's compensation, dated within 30 days from submission.

A completed, signed and dated Declaration of Zero Income form is required for all adults who do not have income. Household income cannot exceed that of the HUD defined "very low income," 50% of Area Median Income (AMI). Priority will be given to households with "extremely low income," 30% of AMI. Income documentation may need to be updated before submission to the Housing Provider.

- e. **Complete Prospective Applicant File.** All Prospective Applicants must have completed all required forms. In addition to the above, the Prospective Applicant must complete and sign all paperwork. A Prospective Applicant File is active for 6 months from the date of Prospective Applicant's signature.

2. All CMHA Subsidy Units

- a. **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 within the past three years of final eligibility determination date, including criminal activity by any family member listed in a family's Prospective Applicant File.
- b. **Exceptions** may be made for Prospective Applicants with criminal convictions of illegal use or possession (without the intent to manufacture, sell or distribute), of a controlled substance occurring more than 18 months before CMHA's decision to terminate or deny assistance. If USHS housing unit has a CMHA voucher or subsidy, CMHA has sole discretion for exceptions to criminal history of eligibility requirements.
- c. **For units that have Section 8 vouchers.** Prospective Applicants who left the voucher program involuntarily due to eviction or violation of program rules are ineligible for housing for a three-year period after said departure, which begins at the termination date of the previous housing assistance or court-approved eviction date.

This three-year ineligibility is reduced to one year for the Rebuilding Lives program, which includes the chronically homeless. This eligibility requirement does not apply to units not receiving a voucher; the Housing Provider may make its decision based on its Tenant Selection Plan.

- d. **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, and (3) if a family member is subject to a lifetime registration as a sexual offender at any time.
- e. **Outstanding Debt.** Prospective Applicants cannot have an outstanding debt owed to CMHA. 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. This eligibility requirement does not apply to units not receiving a voucher.

- f. **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. This eligibility requirement does not apply to units not receiving a voucher.

3. All Tax Credit Units

Prospective Applicants must not be currently enrolled as a full-time student, unless Prospective Applicant falls under one of the following five exceptions outlined in Section 42 of the IRS Code:

- a. Prospective Applicant is receiving assistance under Title IV of the Social Security Act (e.g., TANF).
- b. Prospective Applicant was previously under the care and placement responsibility of the local county children services agency (i.e., foster care).
- c. Prospective Applicant is enrolled in a government-sponsored job training program.
- d. Prospective Applicant is married and eligible to file a joint income tax return.
- e. 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.
- f. Prospective Applicant is a part-time student or is pursuing a GED.
- g. Prospective Applicant must meet the income eligibility criteria as set forth by the housing project.

4. All Family Units

Prospective Applicants must have at least one dependent child (a child under 18 years of age) to be considered for family units in USHS housing.

5. Miscellaneous Eligibility

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

- a. **Prospective Applicants** may not have conviction of a sexual offense or be required to register as a sex offender. Those individuals convicted of any type of sex offense or required to register as a sex offender are, in most cases, ineligible for units within USHS.
- b. **Prospective Applicants** may not have conviction for or eviction from housing due to arson. Prospective applicants who left prior housing due to arson are, in most cases, ineligible for units within USHS. Exceptions may be made for prospective applicants by the Housing Provider, based on their Tenant Selection Plan.
- c. Housing program may serve a specific gender. Gender specific housing programs will make reasonable accommodations for transgendered individuals when possible.
- d. **Prospective Applicant must** have proof of homelessness based on Rebuilding Lives or Chronic Homelessness criteria and a Vulnerability Assessment.
- e. **Prospective Applicant must** be Medicaid eligible. Head of Household must have evidence of a disability that qualifies him or her for Medicaid benefits.

G. Eligibility Determination

Provider Agencies will submit Indications of Interest, Releases of Information and all required documentation (as outlined in Section F) 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. After USHS referral to the Housing Provider, further documentation and eligibility screenings will be conducted by the Housing Provider and CMHA (as required) prior to a Prospective Applicant's approval and/or placement in a unit.

H. Rights & Responsibilities

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 Indications of Interest.

1. Prospective Applicant Rights

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 should 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;
- The right to request a reasonable accommodation in accordance with the Housing Provider's Tenant Selection Plan;
- 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 such information be collected and provided. Prospective Applicants who choose not to release such information are ineligible for placement in USHS units.

2. Nondiscrimination Requirements

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, as applicable.

3. 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.

4. Privacy Protections

All information gathered about the Prospective Applicant listing personally 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.

I. Provider Agency Expectations

Provider Agencies requesting USHS placement services in homeless units shall utilize the Vulnerability Assessment and duration of homeless time to identify the eligible individuals. These individuals must be literally homelessness with certified disability. Provider Agencies are expected to assist in the completion of all necessary forms for housing services. The Provider Agency shall be accountable for the following steps:

1. Observance of all written USHS policies and procedures.
2. Attendance at USHS training sessions.
3. Certification of any staff member who will submit a Prospective Applicant application.
4. Use of current forms to refer Prospective Applicants.
5. Submission of said forms and other necessary documentation to USHS Program Manager.
6. Continuous contact (when possible) with Prospective Applicant so further information or documentation can be collected as needed.
7. Contact with the Housing Provider as needed on Prospective Applicant's behalf.
8. Notification to the Prospective Applicant of his or her status in the process.
9. 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.)
10. Initiation of the Review Panel process to settle disputes.

11. Keep all components of the USHS application up to date in order to keep the application active on behalf of the Prospective Applicant, following the schedule below:

Document	Validity
Income Verification	30 days
COD	180 days
Vulnerability Assessment	180 days
ROI	180 days
Prospective Applicant File	180 days

Table 1

J. Housing Provider Expectations

1. Housing Providers requesting USHS placement services shall identify housing opportunities to ensure that vacancies are filled by the most vulnerable Prospective Applicants.
2. Adhere to all USHS written policies and procedures.
3. Notification to the USHS Program Manager of vacancies, lease-up and Prospective Applicant eligibility.
4. Continuous correspondence with Provider Agency for Prospective Applicant contact and follow up.
5. Notification of housing outcomes (Approval, Barriers or Denial) to the Provider Agency and USHS Program Manager.
6. After a Potential Applicant is approved for housing, the Housing Provider will notify the USHS Program Manager and Provider Agency via email that Potential Applicant has successfully moved into his or her unit.

K. 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 most vulnerable Prospective Applicants matching Housing Provider eligibility will be forwarded to fill vacancies.

1. Adhere to all USHS written policies and procedures.
2. Review of Prospective Applicant File.
3. Determination of eligibility and possible housing incompatibility (i.e., 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).
4. Notification of ineligibility and possible housing barriers to Provider Agencies.
5. Scoring of Vulnerability Assessment.
6. Maintenance of prioritized pool of eligible Prospective Applicants.
7. Follow up with Housing Providers and Provider Agencies as needed.
8. Notification of housing referral to Provider Agency.
9. Provide ongoing training opportunities to Housing Providers and Provider Agencies on utilization of required forms and documentation.

L. Timeline for Prospective Applicant File Processing

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 within two (2) business days if the submitted file is incomplete. Provider Agencies will be asked to retrieve the Prospective Applicant File within two (2) business days. Provider Agencies will retrieve the incomplete files from USHS within two (2) business days. Completed files may be resubmitted at any time.
2. The USHS Program Manager will conduct an eligibility screening on all Prospective Applicants within two (2) business days of receipt of a completed file.
3. The USHS Program Manager will send a list of names, DOBs and SSNs to CMHA monthly or more often, as needed. CMHA will complete records checks on Prospective Applicants (including violations and current housing with CMHA) and notify the USHS Program Manager of the results within two (2) business days of CMHA's receipt of the list of names, DOBs, and SSNs from the USHS Program Manager.

4. The USHS Program Manager will also send a list of names, DOBs and SSNs and signed ROIs to ADAMH to match service utilization by noon on the first and third Tuesday of every month. ADAMH will return the results of service utilization data matching to the USHS Program Manager by Thursday of that week, within two (2) business days.
5. The USHS Program Manager will complete a criminal background check on all HUD Chronically Homeless Prospective Applicants within two (2) business days of file receipt. The USHS Program Manager will complete criminal background check for USHS Non-Rebuilding Lives special populations including Veterans, ADAMH, Medical, and Disabled/Non-Homeless within two (2) business days of file receipt. The USHS Program Manager will complete background checks for Rebuilding Lives Homeless Prospective Applicants before referring a file to the Housing Provider.
6. 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.
7. If a potential vacancy has been identified, the Housing Provider will notify USHS of the vacancy within one (1) business day. Notification will occur by fax or email to the USHS Program Manager using the USHS Unit Vacancy Notification Form.
8. 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 randomly select the Prospective Applicant to be forwarded to the Housing Provider.

The prioritization occurs as outlined in the Prospective Applicant Matching & System Prioritization procedure. 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.

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).

9. The Housing Provider will contact each Prospective Applicant received from USHS within two (2) business days and schedule an interview with such Prospective Applicant.

10. 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.
11. Resolution of the Prospective Applicant's situation (either housed or rejected) should occur no later than 30 days from the date that the Prospective Applicant is forwarded to the Housing Provider.
12. If the Housing Provider denies the Prospective Applicant (e.g., based on 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.
13. 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.
14. 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 #8.

For all lease-up projects:

1. Six months prior to the intended start of a lease-up project, USHS will notify Provider Agencies of the upcoming availability of units. The unit type, subsidy type, eligibility criteria and amount of available units will be shared with Provider Agencies. USHS will request additional referrals into the eligible pools to provide referrals to the Housing Provider for lease up.
2. The USHS Program Manager will send a list of names, DOBs and SSNs and signed ROIs to ADAMH to match on service utilization by noon on Tuesday of every week, starting with three (3) months prior to the project's lease-up date. ADAMH will return the results of service utilization data matching to the USHS Program Manager by Thursday of each week or within two (2) business days.
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 notify the USHS Program Manager within one (1) business day of all units at the new project being leased. The USHS Program Manager will contact the Provider Agencies that assisted the remaining Prospective Applicants who did not receive housing within three (3) business days of such notification.

5. After the USHS Program Manager's notification that the project is fully leased, the Provider Agencies will notify immediately or as soon as possible all remaining Prospective Applicants that they have not been accepted for housing at the respective project.
6. The Housing Provider will send a weekly update on Prospective Applicant move-ins to the USHS Program Manager.

M. USHS Appeals Due Process

Prospective Applicants may appeal eligibility decisions of USHS at the system level (if USHS decision), and/or at the Housing Provider level if the Housing Provider denies Prospective Applicants for housing.

Please see **Section O: 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 Prospective Applicant File for completeness, accuracy, and adherence to program policies and procedures. 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 and the Appeal to the USHS Review Panel.

2. Appeal of Housing Provider Denial

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.

N. USHS Grievance Process

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 and a system representative (representative of ADAMH, CMHA, or CSB) and the option of a representative from the Prospective Applicant's Provider Agency or other representative of the Prospective Applicant's choice in an effort to resolve the grievance. If a grievance cannot be resolved through this informal process, Prospective Applicant may appeal his or her grievance to the USHS Review Panel.

O. Prospective Applicant Rejection of Housing

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 but not limited to individualized housing stabilization plans.

The only two exceptions to refusing housing and remaining in the USHS pool are those listed in Section H(3): Housing Accommodations. USHS encourages all Provider Agencies to submit more than one community application for individuals they are working with who are experiencing homelessness.

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 Director of Programs and Planning 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. Appeal to the USHS Review Panel

The USHS Review Panel will be used when a grievance cannot be resolved through other means. Notice of such an appeal must be made in writing to the USHS Review Panel. The Review Panel will consist of one designee from each of ADAMH, CMHA, CSB, Housing Provider, and the Citizens Advisory Council (CAC). The Review Panel shall meet within ten (10) days of receipt of the appeal to hear the grievance, will make a clear determination at its meeting, and provide written notice of its determination to the Prospective Applicant and the Prospective Applicant's Provider Agency. Thereafter, the Prospective Applicant has the option of pursuing additional redress through any available channels.

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

R. 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 through 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.

Polices & Procedures

Procedure Name: Referrals to USHS

Policy:

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

Procedures:

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

Adopted: March 2010

Revised: October 2014

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 these policies and 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:

1. 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 and his or her supervisor.
2. Only one set of forms will be accepted per household.
3. Provider Agency case workers will be notified within two (2) business days if incomplete forms are received. Provider Agency case workers must pick up incomplete files within two (2) business days or the file will be shredded. Complete files may be resubmitted at any time.

Adopted: March 2010

Revised: October 2014

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 HUD Chronically Homeless Prospective Applicants and prior to forwarding Rebuilding Lives or other Prospective Applicants to the Housing Provider.
2. Send a list of names, DOBs, and SSNs to CMHA for records checks by the fourth Monday of each month or as needed. During lease-up, if the eligibility pools are exhausted, a list of potential applicants will be sent to CMHA on a weekly basis.
3. Send a list of names, DOBs, SSNs and ROIs of all new Prospective Applicants and those who previously received a score of zero (0) utilization, to ADAMH for Prospective Applicant data matching on service utilization by noon, the first and third Tuesday of every month. During lease-up, a list of Prospective Applicants will be sent to ADAMH weekly, each Tuesday, starting with three (3) months prior to the project's lease-up date. Data matching will be done only on the Prospective Applicants for the units that have homelessness eligibility criteria.
4. For family units, the USHS Program Manager will verify that a printout from ODJFS used to verify household composition, is present before forwarding Prospective Applicants to the Housing Provider.
5. Conduct credit checks through FABCO to check Prospective Applicants' eligibility.

CMHA will:

1. Compare this list against its database to determine if any of those on the list are not likely to receive a housing subsidy due to prior conduct in other CMHA housing programs, current housing in CMHA units or due to some other offense.
2. Send the results of the record check back to USHS within two (2) business days. During lease-up, the results will be expedited.

ADAMH will:

1. Compare this list against its database to determine service utilization and return a score for each individual, ranging from zero (0) to six (6) dependent on the individual's use of ADAMH services.
2. Send the results of the data match to USHS on Thursdays or within two (2) business days from the service match request.

Adopted: July 2011

Revised: October 2014

Procedure Name: Prospective Applicant Matching & 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. Those with the longest history of homelessness and the most severe service needs are given first priority. 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 experiencing HUD Chronic Homelessness will have priority over Non-HUD Chronically Homeless Prospective Applicants. The purpose of a prioritized and scored pool is to ensure that:

- HUD 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 service needs and eligibility.

Procedures:

1. Pools: The USHS Program Manager will sort Prospective Applicants into pools.

- a. HUD Chronically Homeless single adults and couples. For couples, at least one individual must be identified as HUD Chronically Homeless.
- b. HUD Chronically Homeless families.
- c. Rebuilding Lives single adults and couples.
- d. Rebuilding Lives families.
- e. Non-Homeless single adults with a disability and couples and families where at least one individual has a disability.

2. USHS HUD Chronically Homeless Prioritization

The USHS Program Manager will sort HUD Chronically Homeless Prospective Applicants into a separate pool, which will be prioritized in accordance with HUD regulations and recommendations. This pool will be prioritized once a month and is separated by household status (i.e., single, couple, and family).

Priority Order

1. Applicants who are HUD Chronically Homeless with the longest history of homelessness, exceeding 365 days and the most severe service needs based on the Vulnerability Score.
2. Applicants who are HUD Chronically Homeless with the longest history of homelessness, exceeding 365 days.
3. Applicants who are HUD Chronically Homeless with the most severe service needs based on the Vulnerability Score.
4. All applicants who are HUD Chronically Homeless, but do not meet any of the aforementioned eligibility criteria.

If there are no HUD Chronically Homeless individuals, the USHS Rebuilding Lives and Homeless Prioritization procedure will be followed.

3. USHS Rebuilding Lives and Homeless Prioritization

The USHS Program Manager will sort Rebuilding Lives Prospective Applicants into a separate pool, which will be prioritized in accordance with HUD regulations and recommendations. This pool will be prioritized once a month and is separated by household status (i.e., single, couple, and family).

Priority Order

1. Rebuilding Lives Prospective Applicants who have the most severe service needs based on the Vulnerability Score. This includes persons exiting an institution where they have resided for less than 91 days but met this standard before entry.
2. Rebuilding Lives Prospective Applicants including persons exiting an institution where they have resided for less than 91 days and were homeless prior to entry.
3. Prospective Applicants coming from places not meant for human habitation, safe havens, or emergency shelters, including persons exiting an institution where they have resided for less than 91 days and were homeless prior to entry.
4. Prospective Applicants coming from transitional housing, where prior to residing there they lived on the streets or in emergency shelter.

4. 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.

5. Vulnerability Scoring

- a.** The USHS Program Manager will evaluate ADAMH service utilization and Applicants vulnerability when allotting each Prospective Applicant a vulnerability score based upon the Vulnerability Assessment. All files will be submitted to a standard evaluation system which is universal and scored based on severe service needs.
- b.** Service utilization will be provided through ADAMH data matching and will result in a score for each individual, ranging from zero (0) to six (6) dependent on the Prospective Applicant's use of ADAMH services.
- c.** Severity of service need is assessed through the Vulnerability Assessment. All homeless single adults are required to have, as part of the Prospective Applicant File, a Vulnerability Assessment completed within six (6) months from the date of receipt of completed file. The USHS Program Manager will score the Vulnerability Assessment and will assign a score ranging from zero (0) to thirty eight (38) for each Prospective Applicant.
- d.** Prospective Applicant needs to provide documentation of a medically confirmed pregnancy at the time of intake submission and at the time her application is identified by the USHS Program Manager.
- e.** Prospective Applicant's total scores will be a combination of both components (service utilization and severity of service need), with the highest possible score of thirty eight (38) and the lowest possible score of zero (0).
- f.** If there are several Prospective Applicants with the same score and they cannot be prioritized by the length of their homelessness, the priority file will be drawn by randomized pick to determine placement into the open unit. The assignment will be indicated on Prospective Applicant File.

6. Pool Maintenance

The prioritization process will be conducted monthly. During a project lease-up, the prioritization process will be conducted more often, as needed (if the eligible pools are exhausted). A rank list for each pool will be constructed monthly.

Adopted: July 2011

Revised: October 2014

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. Conducting a data match with ADAMH to determine service utilization (see the Determination of Prospective Applicant Eligibility procedure).
3. Running records checks through CMHA (see the Determination of Prospective Applicant Eligibility procedure).
4. 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).
5. 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: October 2014

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 Columbus ServicePoint (CSP) 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.

Please see **Section I: Provider Agency Expectations Table 1**, for guidance on validity of documentation.

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. This printout is used to verify or confirm household composition.
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: October 2014

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 HUD Chronically Homeless eligibility pool 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. Resolution of the Prospective Applicant's situation 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. The Housing Provider will notify the USHS Program Manager and the Provider Agency, via email, within two (2) days of Prospective Applicant's move into the open unit.

Adopted: March 2010

Revised: October 2014

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.

Prospective Applicants are given two opportunities to reject a housing unit for any reason. Case workers will continue to seek appropriate housing for them.

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. A Prospective Applicant's denial from placement at one housing site will not preclude the Prospective Applicant from receiving another housing unit through USHS. Denial from housing will have no disparaging effect on the Prospective Applicant's ability to receive other housing.
3. Prospective Applicants have a right to appeal Housing Provider denial by following the Housing Provider's guidelines for appeals.
4. The USHS Program Manager will submit the Housing Provider another eligible Prospective Applicant File to be considered for the vacant unit.

Adopted: June 2011

Revised: October 2014

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. This option will be a safe, decent and affordable housing opportunity with access to supportive services. Accommodations will be made only for reasons found in Section H(3):Housing Accommodations.

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. After the Prospective Applicant has rejected a housing opportunity, his or her file will be returned to the USHS Program Manager for processing.
3. Prospective Applicants have a right to appeal exclusion from the USHS pool in accordance with Section P: Appeal for Re-entry into the USHS Pool following Prospective Applicant's Rejection of Housing Opportunity.

Adopted: June 2011

Revised: October 2014

Procedure Name: Documentation of Homelessness

Policy:

The Prospective Applicant must be 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. If an individual is in an institutional situation, they must have met the definition of literal homeless immediately prior to entry and have resided in the institution less than 91 days.

Procedures:

1. Evidence of Homeless Status

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

- a. Columbus ServicePoint data.
- b. A written monthly observation by an approved outreach worker on a Verification of Street Homelessness form.
- c. For individuals leaving an institutional care facility, the Provider Agency needs to provide exit paperwork from the institution clearly documenting entry, admission and exit/discharge dates.

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 the time of lease signing with the Housing Provider.

2. Evidence of Homelessness Duration

The duration of homelessness is necessary to determine if the Prospective Applicant is HUD Chronically Homeless or Non-HUD 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 Columbus ServicePoint data; and/or
- b. For Prospective Applicants' currently experiencing street homeless, a written observation by an approved outreach worker must be completed monthly. 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 Columbus ServicePoint of a stay in transitional housing).

Definitions

- a.** The duration of homelessness for a HUD Chronically Homeless individual is at least one calendar year without a break or at least four separate episodes in the last 3 years where the cumulative total length of the occasions equals at least 12 months.
- b.** The duration of homelessness for Non-HUD Chronically Homeless Rebuilding Lives individuals is at least 120 days or at least four episodes of homelessness over a lifetime.
- c.** A break in homelessness is considered at least seven (7) or more consecutive nights for which homelessness is not documented.

3. Length of Episodes

To properly document the length of time homeless, it is important to document the start and end date of each occasion of homelessness. An episode must be at least seven (7) days in length and separated by at least thirty (30) days.

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

Procedure Name: Determination of Severity of Service Needs or Vulnerability

Policy:

Prospective Applicant must demonstrate a severity of service needs. Severity of service needs, defined as a history of high utilization of crisis services, significant health challenges, behavioral health challenges or functional impairments. These needs require a significant level of support in order to maintain permanent housing. USHS utilizes the Vulnerability Assessment and service matches with the ADAMH to determine severity of service needs.

Procedures:

1. Every single adult Prospective Applicant in USHS will complete a Vulnerability Assessment as a part of the Prospective Applicant File.
2. The USHS Program Manager will use the Vulnerability Assessment in conjunction with the ADAMH service match to score Prospective Applicant File for pool prioritization.

Adopted: October 2014

Procedure Name: Documentation of a Certified Disability

Policy:

For USHS purposes, documentation of a certified disability must be for one or more of the qualifying conditions listed here: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from traumatic brain injury, chronic physical illness or physical disability.

Certification of Disability documentation must include one of the following:

- a.** COD from a professional licensed by the state to diagnose and treat the condition;
- b.** Written verification of SSI or SSDI from the SSA; or
- c.** Copies of a disability check (e.g., SSDI check or Veterans Disability Compensation).

Procedures:

- 1.** COD forms must be signed by an “Authorized Professional,” which is defined by HUD as 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: October 2014

DRAFT

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.

Moving a tenant from a more service-intense 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.
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 transfers must be submitted to USHS for eligibility checks and transfer prioritization. The submission will include, documentation needed to sustain eligibility, per the USHS procedure above.

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: May 2014

HUD Guidance Received 2014