# 2021 Program Review and Certification Standards
## F. Client Rights

New requirements are in red text and do not apply for the 2021 PR&C review. These requirements will be applicable in 2022. Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2021 PR&C review. Bold are requirements that now apply for the 2021 PR&C review.

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</thead>
<tbody>
<tr>
<td>The agency has a written document outlining clients’ rights posted in a visible and accessible location, read and otherwise made known to clients upon admission, with accommodation for literacy and language barriers. All clients receive a copy of the clients’ rights document upon intake including instructions for grievances and appeals and identifies the agency clients’ rights officer. Rights include, but are not limited to: &gt; Clients have the right to be treated with dignity and respect;</td>
<td>□ A written clients’ rights document is available for review and includes the rights listed in the Standard.</td>
<td>□ Policy Review: CSB reviewed the written clients’ rights document.</td>
<td>□ Compliant</td>
<td></td>
<td>1</td>
<td>All programs</td>
</tr>
<tr>
<td></td>
<td>□ Staff can discuss how the agency ensures that clients’ rights are not violated and the procedure for addressing violations or alleged violations of clients’ rights.</td>
<td>□ Discussion: CSB discussed with agency staff.</td>
<td>□ Compliant with conditions</td>
<td></td>
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<tr>
<td></td>
<td>□ The agency has a process for reading and making known clients’ responsibilities and code of conduct.</td>
<td>□ Other: CSB visually confirmed posting of clients’ rights document in an area accessible to clients.</td>
<td>□ Non-compliant</td>
<td></td>
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<tr>
<td></td>
<td>□ The agency has a process for distributing and making known program rules, regulations and termination policies.</td>
<td>□</td>
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<td></td>
<td>□ The code of conduct contains written guidelines of</td>
<td>□</td>
<td>N/A</td>
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- Clients have the right to physical privacy;
- Clients have the right to be treated with cultural sensitivity;
- Clients have the right to self-determination in identifying and setting goals;
- Clients are clearly informed, in understandable language, about the purpose of the services being delivered, including clients who are not literate and/or are limited-English proficient;
- Clients have the right to confidentiality and information about when confidential information will be disclosed, to whom and for what purpose, as well as the right to deny disclosure;

<table>
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<tr>
<th>Client Rights</th>
<th>Unacceptable Participant Behaviors</th>
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<tbody>
<tr>
<td></td>
<td>unacceptable participant behaviors that would lead to termination of services or program ineligibility. The consequences of rules violations are clearly stated and consistently enforced.</td>
</tr>
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> Clients have the right to reasonable access to records concerning their involvement in the program;
> Clients have the right to have an advocate present during appeals and grievance processes;
> Clients have the right to choose their own housing or to reject substandard housing.

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<tr>
<th>Discussion and Basis for Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard F2</td>
</tr>
<tr>
<td>Agencies cannot deny service delivery because a client is unable to pay for the service.</td>
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<tr>
<td>□ Files contain evidence of clients with zero income upon entry.</td>
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<th>Conclusion</th>
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<tbody>
<tr>
<td>The agency has a grievance policy for addressing alleged violations of clients’ rights. The agency has an appeals policy and follows appropriate due process when handling grievances and appeals and when deciding to restrict clients from services. The program minimizes denials for reasons unrelated to program eligibility criteria. Service restrictions and appeals are reviewed at least annually by administrators or through a quality assurance process. The governing board (or its agent) evaluates all</td>
<td>□ Grievance, appeal, and service restriction policies, as well as summaries of grievance and appeal reports, are available for review.</td>
<td>□ Policy Review: CSB reviewed policies and procedures.</td>
<td>□ Compliant</td>
<td></td>
<td>1</td>
<td>All programs</td>
</tr>
<tr>
<td></td>
<td>□ The program observes the following elements of due process: &gt; An appeal/hearing before someone other than and not subordinate to the original decision maker, in which the client is given the opportunity to present written or oral objections to the decision; &gt; Opportunity for the client to see and obtain evidence relied upon to make the decision and any other documents in the client’s file prior to the hearing, including a written notice to the client containing a clear statement of the reasons for the decision;</td>
<td>□ Discussion: Agency staff explained the appeals process and provided examples of the process.</td>
<td>□ Compliant with conditions</td>
<td></td>
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<tr>
<td></td>
<td>□ Discussion: Agency staff provided examples of trends identified and corrected through the grievance process.</td>
<td>□ Other: CSB reviewed annual grievance, appeal, and service restriction summaries.</td>
<td>□ Non-compliant</td>
<td></td>
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<tr>
<td></td>
<td>□ File Review: Documentation of</td>
<td>□ N/A</td>
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<thead>
<tr>
<th>Grievances to identify patterns and make corrections.</th>
<th>&gt; Opportunity for the client to bring a representative of their choice to the hearing;</th>
<th>A prompt written final decision.</th>
<th>Appeal offers, decision, and disposition prior to exit, except in Shelter when there is imminent health or safety concern.</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ The agency gives clients a copy of the grievance form upon entry. The agency makes reasonable efforts to ensure that all clients understand the grievance policy regardless of the clients’ language.</td>
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<tr>
<td>□ When a service restriction is in effect, the client is informed of the reason, conditions for lifting the restriction, and right to appeal, including who to contact regarding an appeal and information about the appeal process. Staff can describe how any service restriction is compliant with the Homeless Crisis Response System (HCRS) Policies and Procedures (P&amp;Ps*).</td>
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<td>□ Shelter staff can demonstrate that clients have the opportunity to appeal</td>
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</table>

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</table>
| The agency has a termination policy and practice of providing written plans for at-risk clients that include strategies for intervention, prevention, or housing retention that help clients avoid losing housing. | □ The agency can provide the termination policy and documentation that written plans were given to clients. The agency can give examples of clients who successfully and unsuccessfully appealed termination. | □ File Review: CSB reviewed terminated client files.  
□ Policy Review: CSB reviewed termination policies and procedures. | □ Compliant  
□ Compliant with conditions  
□ Non-compliant  
□ N/A | | 1 | PSH, TH, RRH, Prevention |

Clients are involved in monitoring summary information and trends related to grievances as part of the agency quality assurance / improvement practices.

Discussion and Basis for Conclusion

File Review: CSB reviewed terminated client files.

Policy Review: CSB reviewed termination policies and procedures.

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|☐| For RRH and Prevention, the program uses the Homelessness Prevention and Rapid Re-Housing Case Review and Closure Checklist tool to guide service amount, type and duration. |
|☐| The program observes the following elements of administrative and legal due process when terminating clients:  
> A pre-termination hearing;  
> An appeal/hearing before someone other than and not subordinate to the original decision maker, in which the client is given the opportunity to present written or oral objections to the termination decision;  
> Opportunity for the client to bring a representative of their choice to the hearing; and  
> A prompt written final administrative decision prior to termination. |
### Discussion and Basis for Conclusion

**Standard F5**  
The program ensures minority clients receive referrals to suitable decent, safe, sanitary housing not located in areas of minority concentration.

- CSB recommends that agency policy include content to this effect: “To the extent possible, [agency] attempts to identify and cultivate landlords for properties not located in areas of minority concentration so that clients can exercise choice regarding housing options.”

**Guideline F5**  
- Agency policy affirms this right and outlines procedures for referring minority clients to housing not located in areas of minority concentration, based on client choice.

**Monitoring Method**
- Policy Review: CSB reviewed the policy.

**Conclusion**
- Compliant
- Non-compliant

<table>
<thead>
<tr>
<th>Tier</th>
<th>Program Type</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>PSH/USHS, TH, RRH</td>
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<th>Certifying Official*</th>
<th>Tier</th>
<th>Program Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Children and youth have access to public education and receive assistance exercising their rights as protected by the McKinney-Vento Homeless Assistance Act of 1987, as amended, Title VII, Subtitle B; 42 U.S.C. 11431. Heads of households are advised of their rights as they relate to the public education system.</td>
<td>□ Staff can describe measures to ensure that clients’ rights are not violated in relation to public education, including identification of and contact with the local Homeless Education Liaison serving the program's client population. □ There is a process for advising clients of their rights as they relate to the public education system. □ Client files include examples of agencies working with the Homeless Education Liaison or other applicable staff to place children in public school, early childhood programs such as Head Start, Part C services in accordance with the Individuals with Disabilities Education Act, and/or other programs authorized under Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act of 1987.</td>
<td>□ Policy Review: CSB reviewed agency policy. □ Discussion: CSB discussed with agency staff.</td>
<td>□ Compliant</td>
<td></td>
<td>2</td>
<td>All programs serving children and/or youth (18-25)</td>
</tr>
</tbody>
</table>
### Standard F7

#### Guideline F7
- If a family with children is entering permanent housing, the agency makes efforts to house the family as close as possible to its school of origin so as not to disrupt children's education.

#### Monitoring Method
- Discussion: CSB discussed with agency staff how they ensured program applicants received relevant information.

#### Conclusion
- Compliant

#### Certifying Official*

**Tier**

**Program Type**
- 2
- PSH, TH, RRH

### Discussion and Basis for Conclusion

If a family with children is entering permanent housing, the agency makes efforts to house the family as close as possible to its school of origin so as not to disrupt children's education.

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<th>Program Type</th>
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<tbody>
<tr>
<td>Clients are involved in program maintenance and provision of supportive services when applicable.</td>
<td>To the maximum extent practicable, clients and others experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the program and in providing supportive services.</td>
<td>Monitoring Method: CSB discussed with agency staff how clients are involved in program maintenance and provision of supportive services.</td>
<td>Compliant with conditions</td>
<td>2</td>
<td>All programs</td>
<td></td>
</tr>
<tr>
<td>Expectations for clients during program participation are clear and emphasize positive contributions to the living environment and services.</td>
<td>Discussion: CSB discussed client volunteer opportunities with agency staff.</td>
<td>Compliant</td>
<td>2</td>
<td>All programs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Examples include work equity programs and client responsibilities for chores and facility maintenance.</td>
<td>Discussion: CSB discussed work equity options with agency staff.</td>
<td>Non-compliant</td>
<td>2</td>
<td>All programs</td>
<td></td>
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</table>

**Discussion and Basis for Conclusion**

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<th>Program Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>The agency distributes unbiased legal rights brochures to clients that cover topics such as landlord-tenant law, consumer protection, and other relevant topics.</td>
<td>The agency can provide the brochures given to clients.</td>
<td>Self-certification</td>
<td>Compliant</td>
<td>3</td>
<td>All programs</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Standard F10</th>
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<th>Monitoring Method</th>
<th>Conclusion</th>
<th>Certifying Official*</th>
<th>Tier</th>
<th>Program Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clients are informed about and participate in a residents’ council that meets at least quarterly.</td>
<td>Staff assists with convening a residents' council or regular meeting of tenants for a particular project (single site or scattered sites).</td>
<td>Self-certification</td>
<td>Compliant</td>
<td>3</td>
<td>All programs where tenants sign leases</td>
<td></td>
</tr>
</tbody>
</table>
- Staff encourages tenants to participate in the council, which can address a variety of topics, including facility and program concerns.
- Staff keeps notes from council meetings that are available for review.
### Standard F11

#### Guideline F11
- Staff informs clients upon entry into the program that they are eligible to participate in the CAC and YAB, as applicable, and provides information regarding involvement.
- The agency posts information on the CAC and YAB in single site supportive housing buildings and shelters.
- Staff periodically remind tenants about the CAC and YAB and encourage participation.
- Staff assists clients with transportation to CAC and YAB meetings.

#### Monitoring Method
- Self-certification

#### Conclusion
- Compliant
- Compliant with conditions
- Non-compliant
- N/A

#### Certifying Official*
- 3

#### Tier
- All programs

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### Standard F12

#### Guideline F12
- The agency has a written policy and procedure for reporting.
- The agency disseminates the policy and procedure to all staff and ensures that agency staff is trained in the procedure.

#### Monitoring Method
- Self-certification

#### Conclusion
- Compliant
- Compliant with conditions

#### Certifying Official*
- 3

#### Tier
- All programs
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<table>
<thead>
<tr>
<th>☐ Staff can describe how they ensure the policy and procedure is implemented and effective.</th>
<th>☐ Non-compliant</th>
<th>☐ N/A</th>
</tr>
</thead>
</table>

*Homeless Crisis Response System (HCRS) Policies & Procedures* - [https://www.csb.org/providers/csb-hearth](https://www.csb.org/providers/csb-hearth)

CSB reviews Tier 1 standards annually and Tier 2 standards every 4 years. For years when CSB does not review Tier 2 standards, agency staff certifies compliance with both Tier 2 and Tier 3 standards in the 'Certifying Official' column.