

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



**Narrative Manual
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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.

Chronically Homeless (CH) – A homeless household with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the care facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. The individual must have been living as described above continuously for at least 12 months, or on at least 4 separate occasions in the last 3 years, where the combined occasions total a length of at least 12 months and each break in homelessness included at least 7 consecutive nights. (HUD Final Rule: Defining Chronically Homeless, December 4, 2015)

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, 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.

Non-Rebuilding Lives – Household with a disability. 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 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, 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 – Agency working with USHS that has 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) – A homeless household, including an individual or group of persons presenting together with or without children, where the Head of Household is an individual with a disability that has a cumulative length of time spent homeless, whether in shelter or on the street or a combination of the two, totaling at least 120 days or has had at least 4 occasions of homelessness where the combined occasions total at least 120 days and each break in homelessness included at least 7 consecutive nights. Families presenting together with children, living in a direct housing/rapid re-housing unit currently supported by Community Shelter Board are still considered eligible as Rebuilding Lives families if they meet the eligibility criteria.

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 Vulnerability Assessment is used to determine severity of service needs.

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 – Tool used to measure severity of service needs for individuals experiencing homelessness.

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| 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 Income (SSDI) | Unified Supportive Housing System (USHS) |

E. General Eligibility

USHS serves single adults, couples and families, where the head 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 90 days and were homeless at time of admission into the institution.

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.

F. PSH Unit Eligibility Requirements

1. USHS Units

All persons considered for placement in USHS units must meet the following eligibility, and provide necessary documentation to establish 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, 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 copy of letter/form requesting birth certificate for each household member including dependents under the age of 18. Valid U.S. passport is acceptable in place of birth certificate.

- c. 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. Supporting documentation includes U.S. birth certificate, U.S. passport, U.S. certification of naturalization, U.S. permanent resident card, or arrival-departure record with one of the annotations found in Appendix 2 of this document.
- d. Household Composition.** Prospective Applicants must have documentation of household composition. All Prospective Applicant households must have a printout from the ODJFS, regardless of current benefit status. This printout serves as verification of household composition.
- e. Income Documentation.** All Prospective Applicants must have verification of wages from employment, including self-employment. All adults in the Prospective Applicant's household must provide proof of receipt of benefits which may include, but are not limited to: veteran's benefits (military pay), SSI, SSDI, unemployment, TANF/AFDC (general public assistance), court-ordered or

informal child support, alimony, pensions, educational financial assistance (Financial Aid), or worker's compensation, dated within 30 days from submission.

Prospective Applicants must provide documentation of one month of income. 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 "extremely low income," 30% of AMI. Income documentation may need to be updated before submission to the Housing Provider.

- f. **Residency.** Prospective Applicants must be residents of Franklin County, Ohio. 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.
- g. **Homelessness.** Prospective Applicants must be literally homeless residing in emergency shelter, transitional housing, or place not meant for human habitation. Documentation of homelessness must be from Columbus ServicePoint 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 from along with the Length of Stay Calculator must be used to document duration of homelessness, occasions and homeless prioritization criteria.
- h. **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. Acceptable documentation of legal name change is a marriage certificate or abstract, divorce decree, court documentation, or documentation of name correction. 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. 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 (see Appendix 1 for disqualifying offenses) 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 population. 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.

Rental Assistance Program. CMHA will not consider issues listed in this section for those approved for Rental Assistance Program housing projects or units.

3. 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:

- 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.

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

4. Family Units

Family includes, but is not limited to, 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.

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.

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 some 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 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. Housing program may serve a specific gender. Gender specific housing programs will make reasonable accommodations for transgendered individuals when possible.
- 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 a Demographics Form, Release 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 Prospective Applicant file.

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 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 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.

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, the recipient or subrecipient 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.

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. 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.).

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 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

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 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 Prospective Applicant File will expire six (6) months from the date of the Prospective Applicant's signature. 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: December 2016

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.
2. 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 submitted (i.e. marriage certificate, marriage abstract, divorce decree, adoption paperwork, or other court documentation of name change) or identifying information must be corrected with the appropriate provider (i.e. the Social Security Administration, Office of Vital Statistics or Department of Motor Vehicles, etc.).
3. Only one set of forms will be accepted per household.
4. 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: January 2016

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 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 criminal background 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: December 2016

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. USHS uses the order of priority outlined in HUD Notice CPD-16-11 issued July 25, 2016. 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 and scored 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 service needs and eligibility.

Procedures:

1. **Pools:** The USHS Program Manager will sort Prospective Applicants into pools.
 - a. Chronically homeless families presenting together without children where the Head of Household is identified as chronically homeless.
 - b. Chronically homeless families presenting together with children where the Head of Household is identified as chronically homeless.
 - c. Rebuilding Lives families presenting together without children where the Head of Household is identified as Rebuilding Lives eligible.
 - d. Rebuilding Lives families presenting together with children where the Head of Household is identified as Rebuilding Lives eligible.
 - e. Homeless families presenting together with or with children that do not meet Rebuilding Lives criteria.
 - f. Non-Homeless families presenting together with or without children. The Head of Household must be an individual with a disability.

2. USHS Chronically Homeless Prioritization

The USHS Program Manager will sort chronically homeless Prospective Applicants into a separate pool, which will be prioritized in accordance with HUD Notice CPD-16-11, Section III.A. This pool will be prioritized once a month.

Priority Order

1. Chronically homeless households with the **longest history of homelessness** and the **most severe service needs**, based on the Vulnerability Score.
2. Chronically homeless households with the **longest history of homelessness** and **without severe service needs**, based on the Vulnerability Score.

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. If there are no chronically homeless individuals in the pool, the USHS Rebuilding Lives and Homeless Prioritization procedure below 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 Notice CPD-16-11, Section III.B. This pool will be prioritized once a month.

Priority Order

1. A household **with a disability** residing in a place not meant for human habitation, a safe haven, or emergency shelter that does not meet the chronically homeless definition, but where the **cumulative** time homeless is **at least 12 months** and the household has **severe service needs**, based on the Vulnerability Score.
2. A household **with a disability** residing in a place not meant for human habitation, a safe haven, or in an emergency shelter with **severe service needs**, based on the Vulnerability Score. The length of time homeless will also be considered, and USHS will prioritize households that exceed **120 days** or 4 occasions of homelessness, cumulatively totaling more than 120 days, including persons exiting an institution where they have resided for less than 90 days and were homeless prior to entry.
3. A household **with a disability** residing in a place not mean for human habitation, a safe haven, or in an emergency shelter **without severe service needs**, based on the Vulnerability Score. The length of time homeless will also be considered, with priority given to households that exceed **120 days** or 4 occasions of homelessness, cumulatively totaling more than 120 days. This category includes persons exiting an institution where they have resided for less than 90 days and were homeless prior to entry.

4. A household **with a disability** residing in transitional housing, where prior to residing in transitional housing had lived in a place not meant for human habitation, an emergency shelter, or a safe haven. This includes households residing in transitional housing that were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking. Veterans in VA-funded Transitional Housing maintain their Rebuilding Lives Status. Length of time homeless will be considered with priority given to households with longer lengths of homelessness.

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: August 2016

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.
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 for family units. 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 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, sanitary and affordable housing opportunity in good repair with access to supportive services. Accommodations will be made only for reasons found in Section H (3): Housing Accommodations.

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.
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: December 2016

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 90 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 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 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 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 Columbus ServicePoint of a stay in transitional housing).

Definitions

- a. The duration of homelessness for a chronically homeless individual is at least 12 months without a break or at least 4 separate occasions of homelessness in the past 3 years where the cumulative total length of the occasions equals at least 12 months.
- b. The duration of homelessness for a non-chronically homeless Rebuilding Lives individual is at least 120 days (4 months) without a break or at least 4 separate occasions of homelessness where the combined occasions total at least 120 days (4 months) and each break in homelessness included at least 7 consecutive nights.
- c. A break in homelessness is considered 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.

3. Length of Occasions

To properly document the length of time homeless, it is important to document the start and end date of each occasion of homelessness. There is no minimum number of days in which each occasion must occur. An occasion is defined by a break of at least seven (7) days or more for which homelessness is not documented. 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. If an individual is in an institutional situation for fewer than 90 days, it does not constitute a break and counts towards total time homeless.

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: January 2016

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 Head of Household 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

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. 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 CSP.
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. The 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: January 2016

HUD Guidance Received 2014

Procedure Name: Temporary Relocation

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. 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

Procedure Name: Permanent Displacement

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. 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.

Please 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

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 Repair

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.

(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.

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