

## 2020 Program Review and Certification Standards

### E. Program Operations

**New requirements are in red text and do not apply for the 2020 PR&C review. These requirements will be applicable in 2021.**

**Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2020 PR&C review.**

**Bold are requirements that now apply for the 2020 PR&C review.**

Standard E1	Guideline E1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Each program must have written, up-to-date policies and procedures that include all operating policies and procedures for review.	<input type="checkbox"/> This standard only addresses the <u>existence</u> of the below policies and procedures. Requirements regarding the <u>content</u> of each of the policies and procedures are detailed in other standards (noted in parentheses).  <input type="checkbox"/> At a minimum policies and procedures exist on the following: > Conflict of interest (A2) > Religious participation (A3) > Non-discrimination and equal opportunity (A4) > Drug-free workplace (A5) > Weapons and firearms (A6) > Disaster recovery and crisis communication (A7) > <b>Indirect Cost Allocation Plan (D3), if applicable</b> > <b>Procurement and record keeping (D6)</b> > Equipment purchased with federal funds (D8)	<input type="checkbox"/> <u>Policy Review</u> : CSB reviewed the policies and procedures.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

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	<ul style="list-style-type: none"> <li>&gt; Accounting (D9)</li> <li>&gt; Housing First (E2)</li> <li>&gt; Intake and client record keeping (E3)</li> <li>&gt; Annual assessments (E6)</li> <li>&gt; Resident admissions policy/selection (E7)</li> <li>&gt; Cultural competency (E12)</li> <li>&gt; Definition of family (E13)</li> <li>&gt; Standardized assessment process and procedures regarding data collection and privacy (E16)</li> <li>&gt; Holding funds or possessions on behalf of clients (E17)</li> <li>&gt; Clients' rights (F1)</li> <li>&gt; Grievances and appeals (F3)</li> <li>&gt; Termination (F4)</li> <li>&gt; Housing of minority clients in areas of non-minority concentration (F5)</li> <li>&gt; Access to education (F6)</li> <li>&gt; Child and elder abuse (F12)</li> <li>&gt; Disability-related supportive services (H6)</li> <li>&gt; Emergency Transfer Plan (H9)</li> <li>&gt; Relocation (H8)</li> <li>&gt; Fire safety (J14)</li> </ul>					
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	<ul style="list-style-type: none"> <li>&gt; <b>Communicable Disease Detection, Control, and Reporting (J16)</b></li> <li>&gt; DCA application processing (K4)</li> <li>&gt; CSP data sharing (M1)</li> <li>&gt; CSP data collection (M2)</li> <li>&gt; CSP QA plan (M7)</li> <li>&gt; Privacy (M8)</li> <li>&gt; Disclosure of PPI (M9)</li> <li>&gt; Client requests for PPI (M10)</li> <li>&gt; Disposal of PPI (M17)</li> <li>&gt; Reasonable accommodations during data collection (M18)</li> <li>&gt; System security (M19)</li> </ul>					
<p><b>Discussion and Basis for Conclusion</b></p>						

Standard E2	Guideline E2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program adheres to a Housing First model, working to efficaciously prevent literal homelessness or place people	<input type="checkbox"/> Review of case files should clearly demonstrate efforts to quickly obtain low-barrier housing with voluntary services. Clients are	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files. <input type="checkbox"/> <u>Policy Review</u> : CSB reviewed Housing First policy.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions		1	All programs

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<p>experiencing homelessness in housing without preconditions on housing assistance. Quick resolution of housing crises should be the central priority of all programs.</p>	<p>expected to actively work on housing and service plans.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Outreach programs assess client needs and facilitate access to shelter, housing, and services without preconditions.</li> <li><input type="checkbox"/> Shelter, Rapid Re-Housing, Transitional Housing, and PSH providers collaborate to assess clients and identify housing options and service needs without preconditions.</li> <li><input type="checkbox"/> <b>Exits from shelter to other homeless situations are avoided and involuntary exits from shelter are only for imminent health and safety reasons. Shelters enter involuntary exits into the incident section of the client's CSP record with detailed reason for exit and end dates for any service restrictions. Service restrictions are avoided when possible and limited when necessary to imminent health or safety reasons.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>			
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	<p><b>Clients have the opportunity to appeal involuntary discharge decisions prior to being asked to leave the shelter, unless the client is an imminent health or safety risk.</b></p> <p><input type="checkbox"/> <b>Family shelter staff meet with clients within 2 days if they re-enter within 90 days and document conditions required to re-enter. Families are not eligible for shelter for 7 days after an involuntary exit and denied appeal. Family shelters notify Franklin County Children Services (FCCS) of exit to a homeless situation, as required by mandatory reporting laws.</b></p> <p><input type="checkbox"/> <b>CPoA and CARR Team divert clients who have safe and appropriate housing options other than emergency shelter and links clients to prevention assistance, housing, and services, as desired and available, without preconditions.</b></p>					
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	<input type="checkbox"/> Prevention programs assess clients to identify people who will become homeless without assistance. Programs prioritize client assistance based on the urgency and severity of housing and service needs without preconditions.					
<b>Discussion and Basis for Conclusion</b>						

Standard E3	Guideline E3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Homeless status or at-risk of homelessness status is certified and documented at program entry for all programs. Homeless status or at-risk of homelessness status documentation is maintained in accordance with HUD	<input type="checkbox"/> Client files contain homeless certification documentation as required by HUD and approved and standardized by CSB.  <input type="checkbox"/> Documentation confirming homeless status may be a Columbus Service Point (HMIS) entry/exit printout, an approved homeless outreach provider	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files.  <input type="checkbox"/> <u>Policy Review</u> : CSB reviewed the policy.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

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<p>recordkeeping requirements.</p> <p>Intake and client record keeping policies and procedures and files include intake interviews and records of services provided (refer to Homeless Crisis Response System (HCRS) Policies &amp; Procedures* and the <b>Street Outreach Business Rules</b>).</p>	<p>Verification of Street Homelessness Form, <b>written confirmation from another housing or service provider (e.g., CHOICES, Star House), or self-certification, according to the below program-specific guidance.</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Street outreach and CARR Team can use the Verification of Street Homelessness Form to document intake worker observation of literal homelessness.</b></li> <li><input type="checkbox"/> For <u>shelter</u>, <u>street outreach</u>, <u>CPOA</u>, and <b>CARR team</b>, self-certification can be used at the time of program entry. Lack of third-party documentation cannot prevent clients from receiving street outreach, <b>CARR team</b>, emergency shelter, or victim services.</li> <li><input type="checkbox"/> For <u>Engagement Center Safety</u>, if there is a break in shelter stay of 7 days or more, homeless status must</li> </ul>				
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	<p>be re-verified and documented.</p> <ul style="list-style-type: none"> <li>□ For <b>RRH, TH, and PSH</b>, self-certification can be used as a last resort. Self-certification should be used sparingly and only after other efforts to obtain third-party documentation has been noted in the client file.</li> <li>□ <b>For RRH, TH, and PSH, homelessness documentation must be dated within 1 week (7 days) prior to program enrollment. Any gap greater than 7 days between exit from outreach, shelter, RRH, or TH and enrollment into the next program requires documentation of literal homelessness.</b></li> <li>□ <b>Clients enrolled in PSH and RRH maintain their homeless and chronic status prior to housing move-in regardless of current residence, but do not accrue homeless time unless they</b></li> </ul>					
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	<p>are verifiably literally homeless. If a client is enrolled in a PSH or RRH program, they retain eligibility for that PSH or RRH program, regardless of where they reside between program enrollment and move-in. After a client has been enrolled in a PSH or RRH program, they can stay with friends/family or in a hotel/motel without losing PSH or RRH eligibility for the program they have been enrolled in. Program enrollment must be documented by the PSH or RRH provider.</p> <p><input type="checkbox"/> Current literal homeless status is determined by a single episode of homelessness of 1 or more consecutive days in shelter or in a place not meant for human habitation, immediately prior to program admission. For those individuals being released directly from hospital, jail/prison, or another</p>					
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	<p>institution for stays less than 90 days, documentation of homelessness in shelter or on the streets immediately prior to entry into institution, is required. Written documentation of institution entry and exit dates through institution exit paperwork is required.</p> <p><input type="checkbox"/> Stays in institutions of fewer than 90 days do not constitute a break in homelessness and count toward total time homeless when there is documentation of homelessness in shelter or on the streets immediately prior to entry into institution.</p> <p><input type="checkbox"/> For <u>prevention, diversion and CARR Team</u>, documentation confirming imminent risk of literal homelessness must include proof that the household 1) must leave their current housing imminently, 2) has no alternative, safe and appropriate housing, and 3)</p>					
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	<p>has no other resources to obtain or maintain housing. Households must be able to document imminent housing loss with a court-ordered or landlord-issued eviction notice, a letter from the host family or friend indicating the date by which the family must leave, or other documentation showing the household can no longer stay in their current residence.</p>					
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**Discussion and Basis for Conclusion**

Standard E4	Guideline E4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Duration or Episodes of Homelessness are certified and documented in accordance with HUD's December 2015 Final Rule on Defining Chronically Homeless.</p>	<p><input type="checkbox"/> For chronic homeless documentation, agencies must provide evidence that the homeless occasion was continuous, for a 12 month period without a break in living or residing in a place not meant for human habitation or in an emergency shelter or evidence that the household experienced at least four</p>	<p><input type="checkbox"/> Monitored through USHS</p> <p><input type="checkbox"/> <u>File Review</u>: CSB will review any of the selected files that pre-date the agency's participation in USHS.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		<p align="center">1</p>	<p align="center">PSH, USHS</p>

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	<p>separate homeless episodes in the last 3 years where those occasions cumulatively total at least 12 months.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> A break is considered at least seven or more consecutive nights not residing in a place not meant for human habitation or in shelter.</li> <li><input type="checkbox"/> For PSH eligibility documentation, agencies must provide evidence that the PSH eligibility criteria are met as described in the USHS Policies and Procedures.</li> <li><input type="checkbox"/> For Verification of Street Homelessness, a single documented encounter with an authorized outreach provider, on a single day within one month is sufficient to document a household as homeless for that month. This is distinct from calculating the total number of days a household is unsheltered, which is</li> </ul>					
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	based on the sum total of days homeless during a specific episode of homelessness.					
<b>Discussion and Basis for Conclusion</b>						

Standard E5	Guideline E5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
At least one adult in each household must have a qualifying disability.	<input type="checkbox"/> Certification of Disability is required for each Permanent Supportive Housing household.  <input type="checkbox"/> The certification of disability must be issued not more than 180 days prior to the household's entry into the program.  <input type="checkbox"/> The certification of disability must be signed by a professional licensed by the State of Ohio qualified to treat the disabling condition.  <input type="checkbox"/> If the Certification of Disability is not available, a written Social Security Administration verification or copies of a disability check	<input type="checkbox"/> Monitored through USHS.  <input type="checkbox"/> <u>File Review</u> : CSB will review any of the selected files that pre-date the agency's participation in USHS.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	PSH, USHS

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	<p>are acceptable (except <b>Survivor's Benefits or Social Security Retirement</b>).</p> <p><input type="checkbox"/> Disability includes:</p> <ul style="list-style-type: none"> <li>&gt; A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that 1) is expected to be long-continuing or of indefinite duration; 2) substantially impedes the individual's ability to live independently; and 3) could be improved by the provision of more suitable housing conditions.</li> <li>&gt; A developmental disability <b>as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002)</b>.</li> <li>&gt; HIV/AIDS</li> </ul>					
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Standard E6	Guideline E6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Clients receiving PSH, RRH, TH, and Prevention supportive services should be assessed at least once annually by the program to ensure that service needs are being accurately and sufficiently met. Annual assessments are used to determine program direction and updates.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Agency staff can describe how the program staff assess and stay abreast of the service needs of the clients served.</li> <li><input type="checkbox"/> Agency staff can give examples of how programming has been modified based on new information gathered through annual assessments.</li> <li><input type="checkbox"/> Annual assessments are included in client files and include some form of client feedback.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files.</li> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed agency policy.</li> <li><input type="checkbox"/> <u>Discussion</u>: CSB discussed policy with agency and confirmed that a tracking system is in place to ensure timely assessments.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	PSH, RRH, TH, Prevention

**Discussion and Basis for Conclusion**

Standard E7	Guideline E7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The program has written client eligibility criteria consistent with CSB funding requirements</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The resident admissions policy / selection plan includes clearly delineated criteria not intended to unfairly discriminate against</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>File Review</u>: CSB reviewed expedited admissions processes and examples.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> </ul>		1	All programs

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<p>appropriate for the target population <b>and consistent with the HCRS P&amp;Ps*</b>. The admissions policy, including re-entry policies and procedures, is posted. The program may not deny admission unless there are specific documented restrictions applicable to the project due to financing, health and safety, and/or programmatic issues.</p> <p>PSH programs should have expedited admission processes, to the greatest extent possible, including assistance with obtaining necessary documentation. Applicants may not be required to participate in more than two interviews and can be admitted within a few days (if eligible and if</p>	<p>clients and is readily available for review by clients. <b>The policy includes the basis for which an applicant would be considered ineligible for admission.</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> For PSH, the Tenant Selection Plan must prioritize chronically homeless individuals, as defined by HUD, via USHS.</li> <li><input type="checkbox"/> For PSH, admission is expedited for applicants coming from a variety of circumstances and staff aids applicants in obtaining necessary documentation or waiving documentation requirements until after admission. The program does not have a waiting list and participates in USHS.</li> <li><input type="checkbox"/> When applicable to the program type, the agency must adhere to fair housing laws, rental housing laws, and regulations.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Other:</b> CSB reviewed the <b>posted</b> program admissions policy to examine how agency determines client eligibility.</li> <li><input type="checkbox"/> Discussion: Staff can explain admission criteria and how it is disseminated to potential program participants for housing.</li> <li><input type="checkbox"/> <b>Other:</b> For PSH, <b>USHS Program Manager</b> reviewed the Tenant Selection Plan to ensure that USHS is referenced as the Prioritization mechanism.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>			
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<p>an opening is available).</p>	<ul style="list-style-type: none"> <li data-bbox="443 183 890 722"> <input type="checkbox"/> For shelters, eligible clients are those with no alternative, safe housing for the night and whose only alternative is to stay in a place not fit for human habitation or outdoors. Shelters may not deny admission solely due to the lack of client identification. <b>Family shelters meet with clients within 2 days if re-entering in the last 90 days to document re-entry conditions.</b> </li> <li data-bbox="443 764 890 1268"> <input type="checkbox"/> Rules regarding when clients can leave and return to the shelter cannot discriminate against clients and must be reasonable, not causing undue restrictions on shelter access. Shelters cannot ask people to leave the facility during extreme weather conditions, regardless of whether they have a purpose for staying at the shelter during times they normally would have to leave.         </li> </ul>					
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	<input type="checkbox"/> For RRH, clients are not eligible if they have been enrolled in a local RRH program within the last 12 months, unless appealed.  <input type="checkbox"/> For Prevention, families may not be enrolled if assisted by homelessness prevention services within the last two years.					
<b>Discussion and Basis for Conclusion</b>						

Standard E8	Guideline E8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
All shelter intake providers practice diversion and referral to prevention upon receiving requests for shelter, which includes an assessment of immediate housing needs. All diversion efforts include a referral to prevention assistance. When appropriate,	<input type="checkbox"/> Agency staff can demonstrate how they screen each applicant requesting shelter to assess his/her immediate housing needs, available resources, and alternate housing options so as to divert entry into shelter as appropriate.	<input type="checkbox"/> <u>Discussion:</u> Agency explained the referral process and provided examples of clients diverted from shelter.  <input type="checkbox"/> <u>Mock Calls:</u> CSB performs mock calls to review diversion efforts.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	CPOA / Homeless Hotline, Face-to-Face Diversion

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assessment tools ensure that diversion from shelter will not result in the applicant staying in a housing option that is either unsafe or unfit for human habitation.						
<b>Discussion and Basis for Conclusion</b>						

Standard E9	Guideline E9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Client evaluation and feedback are collected, analyzed, available, and used, and there is evidence that clients are involved in decision-making processes, including planning for services. At a minimum, client satisfaction surveys are conducted <b>annually amongst</b>	<input type="checkbox"/> Agency staff can describe the methods used for collecting client feedback, how client feedback is analyzed and used to determine programming changes, and how clients are involved in decision making and service planning.  <input type="checkbox"/> Documentation, including meeting notes, copies of surveys and other evaluation tools, is available for review.	<input type="checkbox"/> <u>File Review</u> : CSB reviewed documentation, including meeting notes, copies of surveys and/or other evaluation tools.  <input type="checkbox"/> <u>Discussion</u> : Agency described methods through which client feedback is collected and used	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	All programs

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<p><b>active clients</b> and at exit and contain questions regarding the following topics:</p> <ul style="list-style-type: none"> <li>&gt; Voluntary participation in religious activities, if any;</li> <li>&gt; Access to housing options;</li> <li>&gt; Access to employment assistance;</li> <li>&gt; Courteous treatment (treated with dignity and respect) <b>in a culturally competent manner</b>;</li> <li>&gt; Access to any other personal development activities;</li> <li>&gt; Major obstacles to obtaining housing/goals.</li> </ul>	<p>Staff can give examples of how client feedback has been used in recent months. A list of dates and types of client participation from the past 12 months is available for review.</p>	<p>to make decisions about service provision and program planning.</p>			
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Standard E10	Guideline E10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency affirmatively furthers fair housing and has a written affirmative marketing strategy to market the program and its benefits to those least likely to apply without regard to race, color, national origin, sex, gender identity, sexual orientation, religion, age, familial status, or disability, as required by 24 CFR Part 578.93(c).</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> A marketing strategy may include materials that describe agency programs, advertising, direct outreach to potential clients, collaboration with organizations that serve potential clients, and efforts to raise funds for and awareness of agency programs.</li> <li><input type="checkbox"/> The agency must maintain records of actions taken to affirmatively market programs and records that assess the results of the marketing strategy. Such actions may include fundraising events, panels, forums, conferences, community engagement, or other instances in which the agency raises awareness of its programs.</li> <li><input type="checkbox"/> The agency must notify CSB if agency staff encounters a condition or action that</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>Discussion:</b> CSB reviewed the strategy, marketing materials, and records of actions taken to affirmatively market the program.</li> <li><input type="checkbox"/> <b>Other:</b> Reviewed website and/or marketing material for the housing logo or statement.</li> </ul> <div style="text-align: center;">  <p>Equal Housing Opportunity Statement: We are pledged to the letter and spirit of U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an affirmative</p> </div>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	PSH, USHS, TH

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	<p>impedes fair housing choice for current or prospective clients. The agency and CSB will work together to give clients information on their rights and available remedies.</p> <p><input type="checkbox"/> Agency materials include the Equal Opportunity statement and/or symbol.</p>	<p>advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, handicap, familial status, or national origin.</p>				
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**Discussion and Basis for Conclusion**

Standard E11	Guideline E11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>There is an adequate number of paid and/or volunteer program staff and security staff in relation to the number of clients served. The required client/staff ratio is set by agreement of the provider agency and CSB and includes on-site and on-call staff. The standard is documented in the weekly staff schedule.</p>	<p><input type="checkbox"/> The program has a daily schedule that shows the number of staff scheduled for each shift.</p> <p><input type="checkbox"/> The staff schedule and staff-to-client ratio is appropriate to meet client needs and achieve established outcomes. Staffing is consistent with the <b>Partnership Agreement(s)</b> and/or the applicable range of staff-to-client ratio by program and facility type.</p>	<p><input type="checkbox"/> <u>Discussion:</u> Agency staff explained staff coverage plan and on-call policy.</p> <p><input type="checkbox"/> <u>Discussion:</u> Agency staff discussed precautions it takes to ensure at least one staff member is</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	All programs

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<p>The agency has a staff coverage plan that accounts for weekend and seasonal changes in staff coverage and plans for staff back-up and on-call coverage, as described in the Partnership Agreement.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The staff knows the average number of clients expected to be on-site during each shift.</li> <li><input type="checkbox"/> Management staff can describe weekend and/or seasonal changes in staff coverage, as applicable.</li> <li><input type="checkbox"/> Management staff can describe the back-up staff coverage plan for direct service and operations staff, including back-up coverage during extended staff absences or vacancies.</li> <li><input type="checkbox"/> Clients and residents are informed of how to contact staff in an emergency. Information is posted in units or distributed to clients upon move-in or when contact information changes. Examples of key staff: resource specialists, case managers, direct service supervisor, program director.</li> </ul>	<p>available at all times.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Discussion:</u> Agency staff described how staffing is appropriate to meet client needs and established outcomes.</li> </ul>				
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Standard E12	Guideline E12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency has a cultural competency plan that identifies core staff competencies relative to the project type and target population(s) served, related agency/program cultural competency training requirements, and a protocol for accessing translation services for persons with limited English proficiency.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The agency can provide the cultural competency plan for review. The plan details the core competencies and training requirements for program staff, and how translation services are provided.</li> <li><input type="checkbox"/> At minimum, core cultural competencies that should be addressed in the plan include the following: Implicit bias; Serving disparate populations/ racism; Serving New Americans; Serving LGBTQ+ clients; Non-Verbal Communication</li> <li><input type="checkbox"/> Client files demonstrate the provision of translation services where necessary.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>File Review</u>: CSB reviewed client file(s) that illustrate translation services.</li> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the cultural competency plan.</li> <li><input type="checkbox"/> <u>Discussion</u>: Staff is familiar with translation options and can explain how to access such services.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		2	All programs
<p><b>Discussion and Basis for Conclusion</b></p>						

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Standard E13	Guideline E13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>All households are given the same access to services regardless of marital status or relationship.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Demonstration of compliance with this standard can include a policy statement regarding the definition of family, included in the agency’s client eligibility criteria.</li> <li><input type="checkbox"/> For family shelters, a family includes one or more dependent children in the legal custody of one or more adults (not to exceed three) who, prior to losing housing, were living together and working cooperatively to care for the children.</li> <li><input type="checkbox"/> For RRH projects, a family includes, but is not limited to any group of persons presenting for assistance together with or without children, regardless of marital status or relationship, actual or perceived sexual orientation, or gender identity, and irrespective of age, relationship, or whether or not a member of the household has a disability.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Policy Review:</u> CSB reviewed policy statement or eligibility criteria regarding the definition of family.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		2	All programs

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	<ul style="list-style-type: none"> <li><input type="checkbox"/> The definition of family for PSH projects is the same as for RRH, except that a member of the household must have a disability.</li>   <li><input type="checkbox"/> For families that do not have physical custody of their child(ren), service providers should take the child(ren)'s status into consideration when exploring housing options.</li> </ul>					
<p><b>Discussion and Basis for Conclusion</b></p>						

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Standard E14	Guideline E14	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
At least one program staff person is on duty at all times with verifiable training in emergency first aid, emergency evacuation, and CPR procedures.	<input type="checkbox"/> Management staff can identify the number of program staff members trained in First Aid, CPR, and emergency evacuation scheduled for each shift. <input type="checkbox"/> Training logs and certificates of completion are available, as well as recent shift schedules.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs where on-site services are provided

Standard E15	Guideline E15	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Shelters provide sufficient food to clients to meet daily nutritional needs. All programs have plans with clients for adequate food provision. If food is prepared for clients, protocol is in place to train staff in safe food practices. There are provisions to ensure food practices are safe. The shelter can produce a food	<input type="checkbox"/> The agency has a plan for providing food for clients and making meal arrangements to provide adequate food for three meals a day, or facilitating access to food. This can include helping clients connect with food pantries and/or the Mid-Ohio Collective. <input type="checkbox"/> The shelter has a plan for accommodating clients with medical or cultural food restrictions and staff can give examples.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	Shelters, PSH, RRH, TH

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service license if required.	<input type="checkbox"/> At sites where clients prepare their own food, clients must have access to a kitchen and a pantry. Food and other necessary supplies are provided as needed.  <input type="checkbox"/> At sites where food is prepared for or delivered to clients, the staff is knowledgeable in nutrition and sanitary food safety handling and safe food storage practices.				
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Standard E16	Guideline E16	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p><b>Access to programs must be provided in accord with the coordinated access policies and procedures in the HCRS P&amp;Ps. Coordinated access policies and procedures</b> adhere to the federal requirements in HUD Notice CPD-17-01 Notice Establishing Additional Requirements for a Continuum of Care Centralized or</p>	<input type="checkbox"/> Written policies and procedures describe the standardized assessment process and any variations for different populations. Written policies also include procedures regarding data collection and privacy.  <input type="checkbox"/> The CPOA covers all of Columbus and Franklin County; is easily accessed; is well-advertised; includes a comprehensive and standardized assessment tool; provides an initial, comprehensive assessment for housing and services; and includes a specific policy regarding those fleeing or attempting to flee domestic	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs

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<p>Coordinated Assessment System.</p>	<p>violence, dating violence, sexual assault, or stalking. Access points are accessible to persons with disabilities and limited English proficiency.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The CPOA offers the same assessment approach at all access points, but may include variations to meet the specific needs of adults without children, adults accompanied by children, unaccompanied youth, pregnant/parenting youth, households fleeing domestic violence, persons at risk of homelessness, and veterans, if these variations would facilitate access and improve the quality of information gathered through the assessment.</li> <li><input type="checkbox"/> Assessments include culturally and linguistically competent questions for all persons that reduce barriers to housing and services for special populations.</li> <li><input type="checkbox"/> The coordinated entry process prioritizes households for housing and services. CPOA and shelters have a uniform and coordinated</li> </ul>					
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Standard E17	Guideline E17	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
If the program holds funds or possessions on behalf of clients, the written policy describes how and when the funds or possessions will be promptly returned upon the client's request.	<input type="checkbox"/> The program has a written recordkeeping system for tracking receipt and return of funds or possessions held on behalf of clients. <input type="checkbox"/> The program has records of accountability for any money management / payee programs for clients' funds or possessions turned over to the program for safekeeping. <input type="checkbox"/> There is an easily accessible process for getting funds/possessions back from program staff.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs

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

CSB reviews Tier 1 standards annually and 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.

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