

2019 Program Review and Certification Standards

F. Client Rights

New requirements are in red text and do not apply for the 2019 PR&C review. These requirements will be applicable in 2020.

Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2019 PR&C review.

Bold are requirements that now apply for the 2019 PR&C review.

Standard F1	Guideline F1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency has a written document outlining clients' rights which is posted in a visible and accessible location, read and otherwise made known to clients upon admission, with accommodation for literacy and language barriers. All clients receive a copy of the clients' rights document upon intake which includes instructions for grievances and appeals and identifies the agency clients' rights officer, if applicable. Rights include, but are not limited to, items such as:</p> <ul style="list-style-type: none"> > Clients have the 	<ul style="list-style-type: none"> <input type="checkbox"/> A written clients' rights document is available for review. The document contains, at a minimum, the rights listed in the Standard. <input type="checkbox"/> Program staff can discuss how the agency ensures that clients' rights are not violated and the procedure for dealing with violations or alleged violations of clients' rights. <input type="checkbox"/> The agency has a process for reading and making known clients' responsibilities and code of conduct. <input type="checkbox"/> The agency has a process for distributing and making known program rules, regulations and termination policies. <input type="checkbox"/> The code of conduct contains written guidelines of 	<ul style="list-style-type: none"> <input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the written clients' rights document. <input type="checkbox"/> <u>Discussion</u>: CSB discussed with agency staff. <input type="checkbox"/> <u>Other</u>: CSB visually confirmed posting of clients' rights document in an area accessible to clients. 	<ul style="list-style-type: none"> <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>right to be treated with dignity and respect;</p> <ul style="list-style-type: none"> > Clients have the right to physical privacy; > Clients have the right to be treated with cultural sensitivity; <p>> Clients have the right to self-determination in identifying and setting goals;</p> <ul style="list-style-type: none"> > Clients are clearly informed, in understandable language, about the purpose of the services being delivered, including clients who are not literate and/or are limited-English proficient; > Clients have the right to confidentiality and information about when confidential information will be disclosed, to whom and for what purpose, as well as the right to deny disclosure; 	<p>unacceptable participant behaviors that would lead to termination of services or program ineligibility. The consequences of rules violations are clearly stated and consistently enforced.</p>					
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<p>> Clients have the right to reasonable access to records concerning their involvement in the program;</p> <p>> Clients have the right to have an advocate present during appeals and grievance processes;</p> <p>> Clients have the right to choose their own housing or to reject substandard housing.</p>						
<p>Discussion and Basis for Conclusion</p>						

Standard F2	Guideline F2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Agencies cannot deny service delivery because a client is unable to pay for the service.</p>	<p><input type="checkbox"/> If the program charges a program fee or rent, clients with zero income are not barred from receiving services for their inability to pay.</p> <p><input type="checkbox"/> Files contain evidence of clients with zero income upon entry.</p>	<p><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files for evidence of zero-income clients.</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">All programs</p>

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Discussion and Basis for Conclusion

Standard F3	Guideline F3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency has a grievance policy for addressing alleged violations of clients' rights. The agency has an appeals policy and follows appropriate due process when handling grievances and appeals and when deciding to restrict clients from services. The program minimizes denials for reasons unrelated to program eligibility criteria. Service restrictions and appeals are reviewed at least quarterly by administrators or through a quality assurance process.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Grievance, appeal, and service restriction policies, as well as summaries of grievance and appeal reports, are available for review. <input type="checkbox"/> The program observes the following elements of due process: <ul style="list-style-type: none"> > An appeal/hearing before someone other than and not subordinate to the original decision maker, in which the client is given the opportunity to present written or oral objections to the decision; > Opportunity for the client to see and obtain evidence relied upon to make the decision and any other documents in the client's file prior to the hearing, including a written notice to the client containing a clear 	<ul style="list-style-type: none"> <input type="checkbox"/> <u>Policy Review</u>: CSB reviewed policies and procedures. <input type="checkbox"/> <u>Discussion</u>: Agency staff explained the appeals process and provided examples of the process in action. <input type="checkbox"/> <u>Discussion</u>: Agency staff provided examples of trends identified and corrected through the grievance process. <input type="checkbox"/> <u>Other</u>: CSB reviewed quarterly grievance, appeal, and service restriction 	<ul style="list-style-type: none"> <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>The governing board (or its agent) evaluates all grievances to identify patterns and make corrections.</p>	<p>statement of the reasons for the decision;</p> <ul style="list-style-type: none"> > Opportunity for the client to bring a representative of their choice to the hearing; > A prompt written final decision. <p><input type="checkbox"/> The agency gives clients a copy of the grievance form upon entry. The agency makes reasonable efforts to ensure that all clients understand the grievance policy regardless of the clients' language.</p> <p><input type="checkbox"/> When a service restriction or ban is in effect, the client is informed of the reason, conditions for lifting the restriction, and right to appeal, including who to contact regarding an appeal and information about the appeal process. Staff can describe how any service restriction or ban is compliant with system-wide policies and procedures (refer to Homeless Crisis Response System (HCRS) P&P's*).</p>	<p>summaries.</p>				
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	<input type="checkbox"/> For shelters, staff can demonstrate that clients have the opportunity to appeal discharge decisions prior to being asked to leave the shelter. This right is waived if a client is a health or safety risk. Shelter discharge policies and procedures must be consistent with HCRS P&P's*.				
	<input type="checkbox"/> Clients are involved in monitoring summary information and trends related to grievances as part of the agency quality assurance / improvement practices.				
Discussion and Basis for Conclusion					

Standard F4	Guideline F4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a termination policy and practice of providing written plans for at-risk clients that include strategies for intervention,	<input type="checkbox"/> The agency can provide the termination policy and evidence documenting the provision of written plans for review. The program can give examples of clients who have successfully and	<input type="checkbox"/> <u>File Review</u> : CSB reviewed terminated client files. <input type="checkbox"/> <u>Policy Review</u> : CSB reviewed termination policies	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-		1	PSH, TH, RRH

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<p>prevention, or housing retention that help clients avoid losing housing.</p>	<p>unsuccessfully appealed termination.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Agencies can demonstrate that staff develops and implements payment plans for rent arrearages, as needed. <input type="checkbox"/> The program observes the following elements of administrative and legal due process when terminating clients: <ul style="list-style-type: none"> > A pre-termination hearing; > An appeal/hearing before someone other than and not subordinate to the original decision maker, in which the client is given the opportunity to present written or oral objections to the termination decision; > Opportunity for the client to bring a representative of their choice to the hearing; and > A prompt written final administrative decision prior to termination. <input type="checkbox"/> Terminations from the program follow eviction procedures 	<p>and procedures.</p>	<p>compliant</p> <p><input type="checkbox"/> N/A</p>			
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	consistent with the Ohio Revised Code, applicable Ohio Landlord-Tenant law, and CSB HCRS Policies and Procedures*.					
Discussion and Basis for Conclusion						

Standard F5	Guideline F5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program ensures minority clients receive referrals to suitable decent, safe, sanitary housing not located in areas of minority concentration.	<input type="checkbox"/> Agency policy should affirm this right and outline procedures for referring minority clients to housing not located in areas of minority concentration, based on client choice. CSB recommends that agency policy include content to this effect: "To the extent possible, [agency] attempts to identify and cultivate landlords for properties not located in areas of minority concentration so that clients can exercise choice regarding housing options."	<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	PSH/USHS, TH, RRH

Discussion and Basis for Conclusion						
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Standard F6	Guideline F6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Children and youth have access to public education and receive assistance exercising their rights as protected by the McKinney-Vento Homeless Assistance Act of 1987, as amended, Title VII, Subtitle B; 42 U.S.C. 11431. Heads of households are advised of their rights as they relate to the public education system.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Program staff can describe measures taken to ensure that clients' rights are not violated in relation to public education, including identification of and contact with the local Homeless Education Liaison serving the program's client population. <input type="checkbox"/> There is a process for advising heads of households of their rights as they relate to the public education system. This information is made available to clients. <input type="checkbox"/> Client files provide examples of clients working with the Homeless Education Liaison or other applicable staff members to place children in public school, early childhood programs such as Head Start, Part C services in accordance with the Individuals with Disabilities Education Act, and/or other programs authorized under Subtitle B of 	<ul style="list-style-type: none"> <input type="checkbox"/> <u>Policy Review</u>: CSB reviewed agency policy. <input type="checkbox"/> <u>Discussion</u>: CSB discussed with agency staff. 	<ul style="list-style-type: none"> <input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A 		2	All programs serving children

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	<p>Title VII of the McKinney-Vento Homeless Assistance Act of 1987.</p> <p><input type="checkbox"/> If a family with children is entering permanent housing, the agency makes efforts to house the family as close as possible to its school of origin so as not to disrupt children's education.</p>					
<p>Discussion and Basis for Conclusion</p>						

Standard F7	Guideline F7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>During the admissions process, applicants have the same due process rights as tenants.</p>	<p><input type="checkbox"/> The program gives program applicants a copy of the clients' rights document, information about appeals, and admission decision with application materials.</p>	<p><input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff how they ensured program applicants received a copy of the clients' rights document, information about</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p>		<p align="center">2</p>	<p>PSH, TH, RRH</p>

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		appeals, and admission decision with application materials.	<input type="checkbox"/> N/A			
Discussion and Basis for Conclusion						

Standard F8	Guideline F8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Clients are involved in aspects of program maintenance and provision of supportive services when applicable.	<input type="checkbox"/> To the maximum extent practicable, clients and other individuals and families experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the program and in providing supportive services for the program. <input type="checkbox"/> Expectations for clients during their program participation are	<input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff how clients are involved in aspects of program maintenance and provision of supportive services. Staff gave specific examples. <input type="checkbox"/> <u>Discussion:</u> CSB discussed client volunteer	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	All programs

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	<p>clear and emphasize positive contributions to the living environment and services.</p> <p><input type="checkbox"/> Examples include work equity programs and client responsibilities for chores and facility maintenance.</p>	<p>opportunities with agency staff.</p> <p><input type="checkbox"/> <u>Discussion:</u> CSB discussed work equity options with agency staff.</p>				
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Standard F9	Guideline F9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency distributes unbiased legal rights brochures to clients that cover topics such as landlord-tenant law, consumer protection, and other relevant topics.	<input type="checkbox"/> The agency can provide the brochures given to clients.	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

Standard F10	Guideline F10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Clients participate in a residents' council. Clients are informed about the project tenant council that meets at least quarterly.	<input type="checkbox"/> Program staff assists with convening a residents' council or regular meeting of tenants of a particular project (single structure or scattered sites). <input type="checkbox"/> Agency staff encourages tenants to participate in the council, which can address a variety of topics, including facility concerns, program concerns, and other relevant topics. <input type="checkbox"/> The agency keeps notes from each council meeting and the notes are available for review.	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 tenants sign leases

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Standard F11	Guideline F11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Clients are informed of CSB's Citizens Advisory Council (CAC) and encouraged to participate. Agencies work to ensure at least one resident per program participates in monthly CAC meetings.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Program staff informs clients upon entry into the program that they are eligible to participate in the CAC and gives them information regarding involvement. <input type="checkbox"/> The agency posts information regarding the CAC in the facility of single structure supportive housing buildings and shelters. <input type="checkbox"/> Agency staff periodically remind tenants about the CAC at group meetings and/or individually and encourage participation. <input type="checkbox"/> Agency staff assists clients with transportation to CAC meetings. 	<p>Self-certification</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A 		<p align="center">3</p>	<p>All programs</p>

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Standard F12	Guideline F12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a written plan and process for reporting child and elder abuse.	<input type="checkbox"/> The agency has a written plan and reporting procedure. <input type="checkbox"/> The agency disseminates the plan to all staff and ensures that agency staff is trained in the procedure. <input type="checkbox"/> Supervisory staff can describe how they ensure the plan is implemented and effective.	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) Policy & Procedures - <https://www.csb.org/providers/csb-hearth>

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

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