

2019 Program Review and Certification Standards H. Housing

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 H1	Guideline H1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency participates in vacancy management with USHS. The agency has an active USHS MOU for each PSH project.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> The agency has a relationship with USHS for vacancy management. USHS prioritizes applicants for housing based on HUD Notice CPD-14-012. <input type="checkbox"/> Clients have the right to be offered up to two housing options. The housing must be decent, safe, and sanitary. If a client declines housing because it is not decent, safe, and sanitary or the housing and services offered with the housing do not meet the client's critical health and safety needs, it will not count as one of the client's two housing opportunities. The offers and reasons for declining must be documented in the client's file. 	<ul style="list-style-type: none"> <input type="checkbox"/> Monitored through USHS 	<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	USHS
<p>Discussion and Basis for Conclusion</p>						

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Standard H2	Guideline H2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>All clients have formal lease agreements prior to receiving rent and/or utility assistance through CSB.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Agency staff can provide client files containing copies of legal leases / occupancy agreements. TRA leases are with CMHA client files if CMHA is processing monthly payments for landlords. <input type="checkbox"/> For PSH Leasing programs, the lease must be in the name of the agency and a sub-lease / occupancy agreement must be executed with the client. <input type="checkbox"/> If a PSH qualifying participant dies, is incarcerated, or institutionalized for more than 90 days, program-assisted housing ends at lease expiration for surviving/remaining members of the household. <input type="checkbox"/> For CoC Leasing and sponsor-based Rental Assistance programs, the agency has documentation of a master lease. 	<ul style="list-style-type: none"> <input type="checkbox"/> <u>File Review:</u> CSB reviewed client files for leases / occupancy agreements. <input type="checkbox"/> <u>File Review:</u> For CoC Leasing and sponsor-based Rental Assistance programs, CSB reviewed the master leases. 	<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	PSH, RRH, TH

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	<ul style="list-style-type: none"> <input type="checkbox"/> The minimum term of the lease / occupancy agreement is 6 months for ESG-funded RRH tenant-based Rental Assistance. <input type="checkbox"/> The minimum term of the lease / occupancy agreement is 12 months with a minimum 1 month renewal clause for ESG-funded RRH project-based Rental Assistance, CoC-funded Rental Assistance, CoC-funded Leasing, and HOME-funded Leasing. <input type="checkbox"/> The minimum term of the lease / occupancy agreement for Transitional Housing is 1 month with a minimum 1 month renewal clause not to exceed 24 months. <input type="checkbox"/> The minimum term of the lease / occupancy agreement is 6 months for projects that are not funded with ESG, CoC, or HOME funds. 					
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<input type="checkbox"/> HOME client leases must be within the city of Columbus.					
Discussion and Basis for Conclusion					

Standard H3	Guideline H3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program has documentation of how tenant rent is calculated annually. The tenant portion of rent and utilities should not exceed 30% of the monthly adjusted gross income, 10% of Annual Gross Income, or the portion of any public assistance designated for housing costs, whichever is greater.	<input type="checkbox"/> Residents are expected, but may not be required, to pay rent for their units. Residents with cash income and a Section 8 voucher are required to pay rent. <input type="checkbox"/> Agency staff will make appropriate adjustments to the tenant portion of the rent when new income information is verified. <input type="checkbox"/> The agency can show documentation of tenant rent calculations, including how frequently rent is recalculated. If applicable, a copy of the recertification completed by CMHA is included in the client file. <input type="checkbox"/> Acceptable income	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files for tenant occupancy fees calculation and annual income verification. CSB will 1) verify that income data in CSP matches data in the client files (as part of the M standards review); 2) verify that updated income data is collected annually and is accurately entered into CSP (as part of the M standards review), and 3) use the income data in client files and CSP	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH

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	<p>documentation includes pay stubs, earnings statements, W-2 forms, employer letters, documentation from the Social Security Administration or other public assistance agency, or a signed self-certification of zero income.</p> <p><input type="checkbox"/> Income documentation must be acquired, reviewed, and updated in the client file and CSP every year, within 30 days of the client's move-in date.</p>	<p>to confirm the calculation of occupancy fees.</p>				
Discussion and Basis for Conclusion						

Standard H4	Guideline H4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency will recertify RRH clients every 12 months, as required by HUD, which includes the assurance that the household income is below 30% Area Median Income. The agency will track</p>	<p><input type="checkbox"/> Agency staff can explain the policy and procedures for client re-assessment.</p>	<p><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files.</p> <p><input type="checkbox"/> <u>Discussion</u>: CSB discussed client re-assessment processes.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p>		1	RRH

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income at both entry and at 90-days and will provide a report when requested.			<input type="checkbox"/> N/A			
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Standard H5	Guideline H5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program complies with HUD CoC and ESG rent reasonableness and Fair Market Rent (FMR) requirements.	<input type="checkbox"/> Agency staff can explain the procedure to ensure rent reasonableness and FMR for units used to house clients. <input type="checkbox"/> Rent reasonableness is determined for each unit by considering: 1) The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit; 2) The rent should not be in excess of rents currently being charged by the same owner for comparable	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files for CoC-funded programs to confirm FMR and rent reasonableness. <input type="checkbox"/> <u>File Review</u> : CSB reviewed DCA files for RRH clients. <input type="checkbox"/> Discussion: Staff can explain how the agency complies with FMR and rent reasonableness requirements. <input type="checkbox"/> Other: During monthly invoice reviews, CSB	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, TH, RRH HUD-funded CoC and ESG programs

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	<p>unassisted units. This comparison can include units advertised for rent as well those actual rents charged.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Rent cannot exceed the FMR for CoC leasing funded units. Rent can exceed FMR for CoC rental assistance funded units, with CSB's express approval, by not more than 10% of the FMR. All units must be within \$50 of the documented Rent Reasonableness Rate. If rent or utilities increase, the rent reasonableness form must be updated to determine if rent remains reasonable and within FMR. <input type="checkbox"/> For CoC leasing funded units, agency used best and reasonable efforts to fill vacancies in an expeditious manner. <input type="checkbox"/> For non CoC leasing funded units, rent cannot be paid with federal funds for any units that are vacant more 	<p>compares CSP rosters to CSP numbers provided on CoC invoices for programs that have Rental Assistance or Leasing Funds to make sure vacant units are filled quickly.</p>				
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	than 30 days or for units leased without an eligible tenant assigned to them.					
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Standard H6	Guideline H6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Disability-related supportive services are voluntary, except where required by HUD regulations, and tenants are not required to engage in disability-related supportive services as a condition of their tenancy, in accordance with Housing First principles. Participation in supportive services that are not disability-related may be required as a condition of the program. Participation may be	<input type="checkbox"/> The agency has a policy and a process for ensuring that all employees are educated regarding the policy. <input type="checkbox"/> Files contain documentation demonstrating that disability-related supportive service participation is voluntary. <input type="checkbox"/> Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication (as provided to a person with a disability to address a condition caused by that disability).	<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"/> <u>Discussion</u> : CSB discussed with agency staff the process for ensuring that all employees are educated regarding the voluntary disability-related supportive services policy.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, TH, RRH

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required if clients are at or have been in imminent risk of eviction and services are necessary to maintain tenancy (e.g., protective payee). The program should not have sobriety requirements unless authorized by the CoC and HUD.						
Discussion and Basis for Conclusion						

Standard H7	Guideline H7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The Eligibility and Prioritization Form and eligibility documentation are signed by the appropriate agency staff and are kept in the client file.	<input type="checkbox"/> Client files contain signed Eligibility and Prioritization Form and eligibility documentation meets requirements. <input type="checkbox"/> Documentation verifying history of homelessness and homelessness at point of entry is in the client file.	<input type="checkbox"/> File Review: CSB reviewed client files to confirm eligibility documentation. <input type="checkbox"/> File Review: PSH Monitored through USHS. CSB will review any of the selected PSH files that pre-date the	<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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	<input type="checkbox"/> Homelessness at point of entry documentation includes a CSP/HMIS entry/exit printout, approved homeless outreach provider Verification of Street Homelessness forms, or self-certification as a last resort.	agency's participation in USHS.			
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Standard H8	Guideline H8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
A client can be relocated temporarily, but only if they can be offered a decent, safe and sanitary unit in the same building or complex upon project completion, or, for scattered sites programs, a comparable unit in the same geographic area. The agency maintains records on any displaced clients. The agency gives	<input type="checkbox"/> The agency must have a written policy on displaced clients. The agency must provide reasonable advanced written notice and must pay for the cost of moving and any increase in rent / occupancy charges / utilities. <input type="checkbox"/> Any client temporarily relocated for more than 1 year is considered permanently displaced and must be offered relocation assistance and payments.	<input type="checkbox"/> <u>File Review:</u> CSB reviewed files of displaced clients, if applicable. <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

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permanently displaced clients advisory services specified by the Fair Housing Act.	<ul style="list-style-type: none"> <input type="checkbox"/> Records on displaced clients must include race, ethnicity, gender, and addresses of where the clients relocated. Information on displaced clients must be documented in CSP/HMIS. <input type="checkbox"/> Clients who are displaced through no fault of their own must be provided a safe, sanitary, comparable unit. A client should be offered up to two comparable units. <input type="checkbox"/> Displaced clients must retain access to similar services after relocation. <input type="checkbox"/> Advisory services for permanently displaced clients under the Fair Housing Act include information on clients' rights to relocate to housing in areas of non-minority concentrations (formerly F5). 				
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Standard H9	Guideline H9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The program has a written emergency transfer plan.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> The agency must have a written emergency transfer plan available for review. <input type="checkbox"/> The plan must identify tenants who are eligible for emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. <input type="checkbox"/> All emergency transfer requests for permanent supportive housing are handled through USHS. 	<ul style="list-style-type: none"> <input type="checkbox"/> Policy Review: CSB reviewed the policy. <div style="text-align: center;">  HUD model emergency transfer p </div>	<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	PSH, USHS, TH, RRH
<p>Discussion and Basis for Conclusion</p>						

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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