Region

**16**

**HCRP Homeless Prevention Program**

**Policies and Procedures Manual**

\*with COVID Pandemic Standards

Prepared by:

Community Action Commission of Fayette County

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# Overview

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The Homeless Crisis Response Program is funded by a grant from the Ohio Department Services Agency. The Homeless Prevention program is designed to provide homeless prevention services to at-risk individuals and families. The HCRP is administered by the Community Action Commission of Fayette County. Clinton, Fayette, Highland, Pickaway, and Ross Counties are partnered under the Homeless Crisis Response Program Program and coordinate services through a Regional Continuum of Care.

Eligible HCRP activities include financial assistance, housing relocation and stabilization services, data collection and evaluation and administrative costs. The HCRP presents a unique opportunity to transform local homeless systems and facilitate a more long-term approach to ending homelessness. For example, the HCRP may help transform a local shelter-based approach, which focuses on the immediate needs of the homeless person or family, to a housing stability approach, which focuses on meeting the long-term needs of the homeless person or family, with a goal of preventing homelessness or ending homelessness expeditiously.

All award recipients, sub recipients and partner agencies with a role in HRPR must read the U.S. Department of Housing and Urban Development (HUD) ESG Notices at [ESG: Emergency Solutions Grants Program - HUD Exchange](https://www.hudexchange.info/programs/esg/) and comply with the requirements within.

**Policies and Procedures Manual Purpose**

The ***Region 16*** ***HCRP Homeless Prevention \*with COVID Pandemic Standards Policies and Procedures Manual*** is designed to provide Region 16’s HCRP award recipients and sub recipients with detailed information regarding HUD’s, OHCP’s, and the Community Action Commission of Fayette County’s HCRP and COVID Pandemic requirements. Region 16 HCRP award recipients must review this document closely to ensure full understanding of the HUD and OHCP income eligibility determination requirements, housing status eligibility determination and appropriate documentation. In addition, Ohio Region 16 HCRP and COVID Pandemic award recipients are responsible for disseminating the information included in this document to staff and partner agencies to ensure that those entities are aware of, understand and comply with the requirements, as outlined.

**Other HCRP Policy and Procedure Resources**

Award recipients and subrecipients must review HUD’s March 2010 document entitled ***Eligibility Determination and Documentation Guidance,*** which is available by visiting [HPRP Webinar: Determining and Documenting HPRP Participant Eligibility - HUD Exchange](https://www.hudexchange.info/resource/1290/hprp-webinar-determining-and-documenting-hprp-participant-eligibility/).

In addition, Ohio Region 16 HCRP award recipients are strongly encouraged to visit HUD’s website ([Welcome to HUD Exchange - HUD Exchange](https://www.hudexchange.info/)) regularly, as HUD continues to revise aspects of the ESG. The Frequently Asked Questions link is a great resource providing answers to a variety of issues encountered during the implementation of HCRP. While award recipients should consider HUD’s website as the primary source of HCRP information, OHCP and the Community Action Commission of Fayette County’s requirements may be more restrictive.

**Target Population**

The target population includes those at imminent risk of homelessness but for HCRP assistance. OHFA HP COVID funds target population includes those who are directly impacted by COVID and at imminent risk of homelessness. Those who meet the HUD definition of homeless, as defined below, will be served under the HCRP Rapid Re-Housing program.

# Homeless Definition (Rapid Re-Housing requirement)

Individuals or families are considered as homeless if they are:

* sleeping in an emergency shelter or;
* sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, street, sidewalks, etc. or;
* staying in a hospital or other institution for up to 90 days, but were sleeping in an emergency shelter or other place not meant for human habitation immediately prior to entry in the hospital or institution or;
* victims of domestic violence that have no other residence; and lacks the resources or support networks to obtain other permanent housing.

# At Imminent Risk of Homelessness Definition (Homeless Prevention requirement)

The multi threshold criteria, as provided in the statute, are:(1) The individual or family has income below 30 percent of median income for the geographic area; (2) the individual or family has insufficient resources immediately available to attain housing stability, and (3) The individual or family housing has been directly impacted by the COVID pandemic. Under the rule, the first criterion refers specifically to annual income and to median family income for the area, as determined by HUD. The second criterion is interpreted as, ‘‘the individual or family does not have sufficient resources or support networks, *e.g.,* family, friends, faith based or other social networks, immediately available to prevent them from moving to an emergency shelter or

another place described in paragraph (1) of the homeless definition [in § 576.2].’’These clarifications are consistent with HUD’s practice in administering its homeless assistance programs and will help ensure consistent application of these criteria. To further ensure consistency of interpretation, the interim rule also clarifies several of the risk factors that pertain to the first category of individuals and families who qualify as ‘‘at risk of homelessness.’’ As provided under the statute, the pertinent risk factors are as follows: (1) Has moved frequently because of economic reasons; i.e. 2 or more times in 60 days (2) is living in the home of another because of economic hardship and has been notified that their right to occupy their current housing or living situation will be terminated within 14 days; (3) lives in a hotel or motel paid for without a voucher or assistance; (4) lives in severely overcrowded housing; (5) or is exiting an institution, which is exiting a publicly funded institution or system of care, such as a health-care facility, mental health facility, foster care or other youth facility, or correction facility. The third criterion specifies that to meet COVID OHFA HP eligibility, household must have been directly impacted by COVID and signed lease in May 2020 or before. If lease is signed AFTER May 2020, then additional COVID impacted documents are required (i.e. loss of income or reduced hours due to COVID, a COVID diagnosis or COVID quarantine).

# Assistance Requirements

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To be assisted with Ohio HCRP HP COVID funds, the target populations must:

* be directly impacted by COVID pandemic mandates that resulted in a decline of income, wage reduction, job loss, health challenges, or similar circumstances and thus an eviction from their housing with immediate threat of homelessness.
* participate in, at least, an initial consultation and then provide case manager or other assessment professional with required documents and complete CE/Enrollment tabs if possible. COVID written in place of participant signature is permitted.
* have a household income below 30 percent of Area Median Income (AMI); at risk of losing housing resulting in homelessness; and
* lack appropriately identified subsequent housing options and the financial resources and support networks needed to remain in the household’s existing housing; and
* be able to maintain their housing once HCRP assistance is terminated.

While HUD’s definition of “literal homelessness” is well understood, identifying persons who are housed but who would be homeless but for the HCRP assistance may be more difficult. Many persons, who are housed but at imminent risk of losing their housing, will not become homeless. These persons are not eligible to receive HCRP assistance.

*\*However, “doubled up” individuals (individual(s) living with family or friends) are eligible for homeless prevention assistance if it is determined the individual(s) would be homeless but for the assistance and meet all other HCRP eligibility criteria. In such cases, a copy of the host family’s lease and a letter from the landlord stating the individual(s) must move must be obtained.*

Also, individual(s) discharged from publicly funded institutions, who meet all HRPR eligibility requirements, may receive HCRP financial assistance and services, including those returning to the community following discharge from a state correctional facility. (\*Not applicable with OHFA HP COVID funds, which pay rental arrears only).

# Eligible Activities

Homeless Prevention

Homeless prevention includes financial assistance and services designed to prevent individuals and families from becoming homeless and divert homeless persons from entering homeless shelters. \*These funds are also used to prevent households from becoming homeless during the COVID Pandemic.

The amount of HCRP homelessness prevention assistance provided should be “need-based,” meaning that award recipients should determine the amount of assistance to be provided based on the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near term.

HCRP is not a mortgage assistance program. However, homeowners who are at imminent risk of becoming homeless are HCRP eligible if they meet the other eligibility criteria. Therefore, homeowners may receive assistance with utility payments (including arrears, but excluding deposits) and housing relocation search and stabilization services (e.g., credit repair, case management and housing search,/placement, excluding legal services related to a mortgage). (\*Not applicable with OHFA HP COVID funds, which pay rental arrears only).

Appropriate and detailed documentation of imminent risk of becoming homeless is imperative for homelessness prevention activities and Ohio HCRP award recipients must target Ohio HCRP funds to those households at the greatest risk of becoming homeless. \*For COVID HP funds, proof of impact by COVID must be provided to be eligible for funds. OHFA HP funds can have direct impact proven with lease agreement signed May 2020 or earlier. If lease is signed AFTER May 2020, then additional COVID impacted documents are required (i.e. loss of income or reduced hours due to COVID, a COVID diagnosis or COVID quarantine).

*Financial Assistance and Housing Relocation and Stabilization Services*

Award recipients undertaking HCRP homeless prevention activities may provide both financial assistance and housing relocation and stabilization services to help those who are at risk of experiencing homelessness to prevent individuals and families from becoming homeless. (\*Not applicable with OHFA HP COVID funds, which pay up to 6 months rental arrears only).

*Rental Arrears*

Award recipients may pay up to six months of rental arrears for eligible program participant, this is also in compliance with COVID pandemic mandated guidelines. Rental arrears may be paid if the payment enables the program participant to remain in the housing unit for which the arrears are being paid. If HCRP funds are used to pay rental arrears, arrears must be included in determining the total period of the program participant’s rental assistance, which may not exceed 24 months of total HCRP services. \*COVID OHFA HP funds are a one-time payment with no ongoing rental assistance.)

*Security and Utility Deposits*

HCRP funds may be used to pay for security deposits, including utility deposits, for eligible program participants. The agency providing the HCRP security deposit must notify the landlord that the security deposit is to be returned to the agency, not the program participant. \*Not applicable with OHFA HP COVID funds.

*Utility Payments*

Award recipients may pay for up to 24 months of utility payments, including up to six months of utility payments in arrears, for each program participant. Keep in mind, utility payments through HCRP HP count towards the participants lifetime eligibility maximum of 24 months. Participant must provide proof of responsibility for utility payment. This can be done with either a member of his/her household having the utility account in his/her name with a utility company or proof of responsibility to make utility payments, such as cancelled checks or receipts in his/her name from a utility company. \*Not applicable with OHFA HP COVID funds.

*Grantees can provide utility-only assistance, but HUD expects that this will be rare*. First, there are laws governing public utilities in many states that prevent utility companies from shutting off power toa unit during winter months, and which may also require the utility company to offer payment plans to households that miss payments. Second, staff must confirm that no other utility assistance, such as LIHEAP, is available to prevent the shut-off. If neither of these conditions exists, however, utility-only assistance may be justified under a couple of different scenarios. First, if utilities are shut off during winter months, this can result in a dangerous situation for the occupants. If the household is going to have to abandon the housing due to a lack of utilities and can avoid moving to a shelter by having utilities paid, then HCRP funds may be used for this purpose. Under another scenario, an applicant’s lease may include a provision requiring utilities be maintained for the unit by the tenant. As a result, a utility shut-off could constitute a lease violation, thus placing the household at risk for eviction. In both cases, it is the grantee or subgrantee's responsibility to confirm and document in the case file that the utility company will in fact shut-off the utility if the amount due is not paid. If the household is going to have to leave the housing due to a lack of utilities, can avoid literal homelessness by having utilities paid, and meets other HCRP eligibility requirements, then a household may be assisted under the Homelessness Prevention category with utility-only assistance. With regard to documentation, a copy of a utility shut-off notice or arrears statement is not sufficient by itself to document program eligibility. In addition to documenting, via an assessment, that the household has no other financial resources, support networks, or other housing options, grantees/ subgrantees must also assess and document that a household with a utility shut-off notice will become literally homeless but for HCRP assistance. In practical terms, this means that HCRP staff must assess whether the household will lose their housing if the utility is shut-off (i.e., it will constitute a lease violation causing lease termination and/or will cause housing to be unfit for human habitation). HCRP staff should attempt to obtain a copy of the participant's lease and highlight the provision related to utility obligations and consequences. If unable to obtain a lease, HCRP staff should assess and record such circumstances in the HCRP participant case file. As with other HCRP eligibility documentation, HCRP staff must first attempt to obtain third-party verification. Participant self-declaration is only acceptable if third-party documentation cannot be obtained.

*Motel and Hotel Vouchers*

HCRP funds may not be used for motel and hotel vouchers. Other sources of funding should be used to assist in providing motel & hotel vouchers to households. (\*OHFA HP COVID funds are for rental arrears only.)

**Housing Relocation and Stabilization Services**

Funds may be used for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them obtain housing stability. Services and activities may include counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; assuring that program participants’ rights are protected; and developing an individualized housing and service plan, including a path to permanent housing stability subsequent to HCRP financial assistance. \*Not applicable with OHFA HP COVID funds.

*Outreach and Engagement*

HCRP funds may be used for services or assistance designed to publicize the availability of programs to make persons who are homeless or almost homeless aware of these and other available services and programs. \*Not applicable with OHFA HP COVID funds.

*Housing Search and Placement Services*

HCRP housing funds may be used to assist individuals or families in locating, obtaining, and retaining suitable housing. This may include tenant counseling; helping individuals and families to understand leases, securing utilities, representative payee services concerning rent and utilities and mediation and outreach to property owners related to retaining housing. \*Not applicable with OHFA HP COVID funds.

*Legal Services*

HCRP funds may be used for legal services to help people stay in their homes, such as services or activities provided by a lawyer or other person(s) under the supervision of a lawyer to assist program participants with legal advice and representation in administrative or court proceedings related to tenant/landlord matters or housing issues. Legal services related to mortgages are not eligible. \*Not applicable with OHFA HP COVID funds.

*Credit Repair*

HCRP funds may be used for services that are targeted to assist program participants with critical skills related to household budgeting, money management, accessing a free personal credit report and resolving personal credit issues.

Data Collection and Evaluation

Data collection and evaluation costs include appropriate costs associated with operating a Homeless Management Information System (HMIS) for purposes of collecting and reporting data required under HCRP. Eligible costs include the:

* purchase of HMIS software and/or user licenses (non-balance of state areas);
* leasing or purchasing needed computer equipment for providers, costs associated with data collection;
* entry and analysis; and
* staffing associated with the operation of the HMIS, including training.

HMIS activities that are ineligible include:

* planning and development of an HMIS;
* development of new software systems;
* contracting for program evaluation; and
* replacing state and local government funding for an existing HMIS.

\*Not applicable with OHFA HP COVID funds.

**Administrative Costs**

HCRP funds may be used for accounting of grant funds, preparing reports, obtaining program audits, similar costs related to administering the grant after the award and staff salaries associated with these administrative costs. Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about HCRP.

Administrative costs do not include the costs of issuing financial assistance, providing housing relocation and stabilization services or carrying out eligible data collection and evaluation activities, as specified above, such as staff salaries, costs of conducting housing inspections, and other operating costs. These costs should be included under one of the three other eligible activity categories. \*Not applicable with OHFA HP COVID funds.

# Ineligible Activities

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The following activities are ineligible for funding under HCRP:

* financial assistance to pay for expenses that are available through other ARRA programs, including child care and employment training;
* mortgage costs;
* legal fees for homeowners;
* construction or rehabilitation;
* credit card bills or other consumer debt;
* car repair or transportation costs;
* travel costs;
* food;
* medical or dental costs or medicines;
* clothing and grooming;
* home furnishings;
* pet care;
* entertainment;
* work- or education-related materials;
* cash assistance;
* developing discharge planning programs in mainstream institutions; and
* certifications, licenses, and general training classes.

# Assessment of Potential Participants

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Ohio HCRP award recipients must develop a solid, well-conceived and implemented HCRP assessment process to determine and document participant eligibility. \*For homeless prevention participants this includes documentation supporting the requirement that eligible participants would be homeless “but for” this assistance. Award recipients and sub recipients must carefully assess potential program participants to determine the level of services needed, other resources available to assist the potential program participant, and the appropriateness of participation in the HCRP. Award recipients must tailor the amount of assistance to the needs and circumstances of the household, so that only the minimum amount needed to obtain housing stability is provided. Program participants requiring longer-term housing assistance and services should be directed to alternative programs than can provide the necessary services and financial assistance. \*OHFA HP COVID funds directly correlate to the “but for” assistance requirement through eligibility standards.

# Income Definition

Income is any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. Annual income includes the current gross income of all adult household members and unearned income attributable to a minor (e.g., child support, TANF payments, SSI payments and other benefits paid on behalf of a minor).

* Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.
* Current Income is the income that the household is currently receiving at the time of application for HCRP assistance. *Income recently terminated should not be included*.

The HCRP income definition contains income "inclusions" (types of income to be counted) and "exclusions" (types of income that are not to be counted as income) for HCRP purposes. The following types of income must be counted (inclusions) when calculating gross income for HCRP eligibility purposes:

* Earned Income;
* Self-Employment/Business Income;
* Interest & Dividend Income;
* Pension/Retirement Income;
* Unemployment & Disability Income;
* TANF/Public Assistance;
* Alimony, Child Support and Foster Care Income; and
* Armed Forces Income

The follow types of income are NOT counted (exclusions) when calculating gross income for HCRP eligibility purposes:

* Income of Children;
* Inheritance and Insurance Income;
* Medical Expense Reimbursements;
* Income of Live-in Aides;
* Disabled Persons;
* Student Financial Aid;
* Armed Forces Hostile Fire Pay;
* Self-Sufficiency Program Income;
* Other Income (i.e., temporary, non-recurring or sporadic income);
* Reparations;
* Income from Full-Time Students;
* Adoption Assistance Payments;
* Deferred and Lump Sum Social Security & SSI Payments;
* Income Tax and Property Tax Refunds;
* Home Care Assistance; and
* Other Federal Exclusions.

Note that household assets are generally not counted as income, with the exception of interest and dividend income, as indicated above. However, household assets should be taken into account when determining whether a household has other financial resources sufficient to obtain or maintain housing.

# Treatment of Assets

Assets are cash or material items that can be converted to cash quickly. They include both real and/or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant.

Assets do not include:

* Necessary personal property;
* Assets not accessible to family;
* Business or farming operation assets;
* Equity in manufactured homes; and
* Vehicles/special equipment for disabled persons.

HUD has not established requirements for how assets are to be treated in determining whether an applicant household has financial resources to address their housing need and what, if any, amount of assets held by an applicant household must be spent down in order to qualify for HCRP assistance or to determine the appropriate type or level of HCRP assistance. Instead, award recipients and subrecipients are required to determine whether an applicant household must spend down its assets and, if so, by how much, for the purpose of determining eligibility and the type and level of HCRP assistance. Award recipients may establish a separate policy for each local Continuum of Care (CoC) where one or more subrecipients operate. In all cases, policy related to treatment of assets must be uniform across all subrecipients within a local CoC and determinations must be applied consistently to all applicant households within the CoC.

Assets include:

* Bank accounts;
* Life insurance policies;
* Lump sum payments\*;
* Retirement/pension funds\*\*;
* Personal property held as investments;
* Trusts;
* Stocks, bonds, mutual funds, etc.;
* IRAs, Keogh, annuities, and similar retirement accounts;
* Franchises; and
* Assets disposed of for less than fair market value (selling a car/house/piece of property for less than market value).

\*Lump sum payments received by an individual/family are generally counted as assets. Normally, when a person receives a lump sum (large amount of money) – the household will place the money into a checking or savings account, purchase stocks/bonds or purchase a certificate of deposit. A lump sum payment is counted as an asset only as long as the family continues to possess it. If the family uses the money for something that is not an asset –

a car or a vacation or education – the lump sum must not be counted. Examples of lump sum payments include the following:

* Cash from the sale or assets;
* Capital gains;
* Lottery winnings paid in one payment;
* Inheritances;
* Insurance settlements (including Social Security (SSI/SSDI), health and accident insurance, workers compensation, personal and property losses; and
* Any other amounts that are received in one-time lump sum payments.

 \* Retirement/Pension Funds -- Balances held in retirement accounts are counted as assets if the money is accessible to the family member. For employed individuals, accessible amounts are counted even if withdrawal would result in a penalty. However, amounts that would be accessible only if the person retired are not counted. IRA, Keogh, and similar retirement savings accounts are counted as assets, even though withdrawal would result in a penalty. Include contributions to company retirement/pension funds:

* While an individual is employed, count only amounts the family can withdraw without retiring or terminating employment
* After retiring or terminating employment, count as an asset any amount the employee elects to receive as a lump sum.
* Include in annual income any retirement benefits received through periodic payments.

See [Training and Templates – COHHIO](https://cohhio.org/boscoc/training-and-templates/).

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# Real Estate Considerations

If a family owns real estate, it may be necessary to consider the family’s equity in the property as well as the expense to the sell the property. Example: the family owns a piece of property with a market value of $15,000 and owes $3,000. The cost to dispose of the property would be $1,500 (10% of market value to sell property). To determine the cash value:

$15,000 (market value) - $3,000 (amount owed) = $12,000 – $1,500 (cost of selling property) = $10,500

Cash Value = $10,500.

For more information, refer to the Coalition on Homelessness and Housing in Ohio document “Handling Assets”([Training and Templates – COHHIO](https://cohhio.org/boscoc/training-and-templates/)).

# Region 16 Asset Policy

Assets will be included in the documentation of HCRP Eligibility. Applicants are required to disclose all applicable assets during assessment. Assets must be spent down to the amount of one month of their current housing expenses prior to application of HCRP assistance to prevent homelessness with special consideration given to the participant’s income and expenses for the current period. Participant files should document the value and income earned from assets, the participant’s monthly budget, and the participant’s need.

# Income Eligibility Calculation

HCRP HP and OHFA HP COVID eligibility requires a household income below 30% AMGI guideline. Income guidelines are determined by the household’s annual income, as based off the past 30 days **gross income**. REMINDER: *Income recently terminated should not be included*.

To calculate annual income using current monthly gross income; use the monthly gross income as documented (paystub, award letter, etc.) and divide by 12 months, this will create an average monthly wage. Use the average monthly wage & multiply by 12 to determine annual income. This calculation of annual income will be used to determine income eligibility as set by HUD.

To determine an average wage per payment period based on hourly rate and employment status information only (F/T-40hrs or P/T-25hrs); multiply the hourly pay rate by number of hours per pay period. This is the average wage per payment period. Use the average wage per payment period to calculate an annual income with one of the following calculations:

* Weekly Pay Period: Average Wage multiplied by 52 weeks
* Bi-Weekly (every other week): Average Wage multiplied by 26 bi-weekly periods
* Semi-Monthly Wage (twice a month): Average Wage multiplied by 24 semi-monthly periods: or
* Monthly: Average Monthly Wage multiplied by 12 months.

# Income Calculation Worksheet

The Income Calculation Worksheet, available at [HPRP Income Eligibility Calculation Worksheet - HUD Exchange](https://www.hudexchange.info/resource/1179/hprp-income-eligibility-calculation-worksheet/), can be completed to determine gross annual household income and the amount of rent the household is required to pay each month. Income verified at the time of application is annualized to project gross annual income. There are no allowances/deductions from the household’s gross income. \*Region 16 note: The HCRP enrollment documents have everything that this worksheet has within them already.

# Verification of Income

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The Self-Declaration of Income form is required to be completed by all adult members of the household (18+). This form should be completed during the CE process. Individuals/families completing the Self-Declaration of Income form must provide supporting documents such as; pay stubs, SSI statements, etc. In addition, an individual/family must complete a Self-Declaration of Income form if they have no source of income at time of enrollment. \*OHFA HP COVID requires income for household to sustain rental obligation after program provides rental arrearage assistance.

The 3rd Party Verification of Income form verifies a source of household income that the participant has not yet received any documentation for. This form must be completed by the employer or the agency providing income and mailed or faxed directly to the requesting agency. *The 3rd Party Verification of Income form should* ***not*** *be hand delivered by the HCRP participant.* The 3rd Party Verification of Income form is the preferred method of verifying income with no supporting documentation; however, if there is no response within **10 business days**, the Self-Declaration of Income form may be used as sole income verification until documentation is provided. HCRP staff must document in the participant’s file the attempt to obtain a third-party verification. NOTE: Detailed information about income may be found at

[HPRP Documentation Checklist Templates - HUD Exchange](https://www.hudexchange.info/resource/1869/hprp-documentation-checklist-templates/).

# Timeliness of Income Documentation

The definition of income for the HCRP reflects an applicant household’s income at the time of application. Accordingly, documents and information collected to verify income should be recent. Documentation that is dated within 30 days prior to the time of application is acceptable for purposes of HCRP. However, for public assistance benefits (e.g., SSI, food stamps), a benefits statement received any time within the 12 months prior to the time of application and reflecting current benefits received by an applicant household is allowed. A copy of a recent bank statement indicating direct deposit of benefit(s) is also acceptable.

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# Determining Acceptable Level of Documentation

Award recipients and subrecipients must make a conscientious and reasonable effort to use the highest documentation standard possible. An acceptable documentation standard may be dependent on two issues: the resources of the award recipient or subrecipient providing HCRP assistance; and the type of assistance provided.

To determine the highest documentation standard that is reasonable, each HCRP award recipient or subrecipient should review existing resources (i.e., funding, capacity, pre-existing income verification process for other programs) available within their agency. Some award recipients or subrecipients may already have a third-party verification process in place that could be reasonably incorporated into the HCRP eligibility determination and documentation process. However, for other types of organizations (e.g., small nonprofits), a lower level of income or housing status verification and documentation may be all that is reasonable.

Establishing a reasonable documentation standard also depends on the type of service provided. For example, some income documentation requirements for one-time or emergency assistance may not be reasonable given the time-sensitive and/or short-term nature of the assistance. It may not be reasonable to delay HCRP assistance if third-party documentation cannot be obtained in time to allow for assistance to be provided and literal homelessness averted. Medium-term rental assistance (which may be provided over a period of four to eighteen months) and/or other ongoing assistance (i.e., case management) may allow for a higher documentation standard. The HCRP award recipient or subrecipient must provide a brief written description of efforts to obtain third-party documentation in the participant case file (e.g., in case notes, participant assessment or on applicant self-declaration). HCRP staff must clearly and briefly describe in participant case files each instance when a lower documentation standard is used other than the most preferred standard. This may be completed as part of the documented participant assessment or as part of other case file documentation (e.g., in case notes, on income verification form). Detailed information about documentation may be found at

[HPRP Documentation Checklist Templates - HUD Exchange](https://www.hudexchange.info/resource/1869/hprp-documentation-checklist-templates/).

# Income Documentation Standards

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Award recipients and subrecipients are responsible for verifying and documenting the eligibility of all HCRP applicants prior to providing HCRP assistance. They are also responsible for maintaining this documentation in the HCRP participant case file once approved for assistance. Award recipients with insufficient case file documentation may be found out of compliance with HCRP regulations during a HUD, OHCP, CACFC, or another monitoring. It is important for award recipients to develop policies and procedures to ensure appropriate documentation is obtained and included in HCRP participants’ files.

For purposes of HCRP, various types of income documentation are allowable, ranging from third-party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the type of income or particular housing status and circumstance being documented. When general documentation standards cannot be met (i.e. pay stubs, award letters, etc.), the following are acceptable in order of preference:

1. Written Third Party -- Verification in writing from a third party (e.g., individual employer, Social Security Administration, welfare office, emergency shelter provider, etc.) either directly to HCRP staff or via the applicant is most preferred. Written third party documentation may include completion of a standardized form, such as the “3rd Party Verification of Income” template.

2. Oral Third Party -- Verification from a third party (e.g., individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to HCRP staff. Oral third-party verification is acceptable only if written third-party verification cannot be obtained. HCRP staff must document reasons why third-party written verification could not be obtained in the HCRP participant file. **Note:** This is different from applicant Self-Declaration of income. If an applicant orally declares income, it will fall under “applicant self-declaration” below.

3. Applicant Self-Declaration -- An affidavit of income and housing status as reported by the household is allowable but is only acceptable if due diligence by the case manager of obtaining written or verbal third-party verification is documented. HCRP staff must document reasons why efforts made to third party written, or oral verification were not successful in the HCRP participant file. *While accepted, it is recognized this should only happen in rare occurrences and understood that required verifying documents will be obtained while participant is enrolled in HCRP project.*

Award recipients and subrecipients must carefully review the participant case files periodically to ensure that the documentation is sufficient to meet the eligibility criteria. Two of the most common monitoring findings are missing or incomplete eligibility documentation. Remember, specifically for housing status, determining eligibility can be a multi-level process; applicants must meet ALL criteria and evidence of this must be present in the case file.

# Participant File Information

Ohio HCRP award recipients and subrecipients are responsible for ensuring that HCRP-assisted applicants are eligible to receive HCRP assistance. To meet this requirement, documentation may be obtained from a third-party information source (preferred) or the participant (with appropriate self-declaration documentation) and is typically obtained during the intake, entry or from a referral by another service provider. The documentation must be maintained in the participant file and made available for monitoring/audit or risk analysis purposes.

In addition, participant files must include the following, as appropriate:

* evidence that the award recipient is targeting assistance to those persons at greatest risk of becoming homeless and meet the standard that the households would be homeless but for the HCRP assistance;
* evidence that a lead-based paint visual assessment was conducted for all units where a HCRP-assisted household is living and the household receives financial assistance, the unit was constructed prior to 1978, and a child under the age of six is or will be residing; \*Not applicable for OHFA HP COVID
* documentation that the unit to be occupied by an HCRP-assisted household meets the habitability standards as described at [HPRP Unit Inspection Requirements - HUD Exchange](https://www.hudexchange.info/resource/1152/hprp-unit-inspection-requirements/); \*Not applicable for OHFA HP COVID
* Staff Certification of Eligibility for HCRP Assistance form signed by case manager assigned to household and HCRP management.
* Housing Status Documentation Form with 3rd party verification (preferred) or Self-Declaration of Housing Status for households receiving HCRP assistance allowed in rare occurrences (see Homeless Certification in the Documentation section below); \*OHFA HP COVID requires proof of impact by COVID. Direct impact can be proven with lease agreement signed May 2020 or earlier. If lease is signed AFTER May 2020, then additional COVID impacted documents are required (i.e. loss of income or reduced hours due to COVID, a COVID diagnosis or COVID quarantine).
* a copy of a signed lease is required for households receiving HCRP assistance in the form of rental assistance, security/utility deposits and utility payments. All household members must be listed on a lease. Leases must be approved by the HCRP case manager/housing resource specialist. If a Housing Quality Standards (HQS) inspection is required due to another source of funding, a lease cannot be signed until after the inspection is complete and necessary repairs are made. If the landlord agrees to lower the rent due to the need for HCRP assistance, a new lease must be signed. The rent amount, after the HCRP rental assistance ceases, could be renegotiated.
* Inspection of unit to receive HCRP funds is required. Note that the habitability standards are different from the HQS used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a recipient could use either standard for HCRP compliance. Also note that the HCRP Notice does not exempt units from having to be compliant with local housing codes. Therefore, if there are requirements that are in both the local housing code and the HCRP Notice, the recipient must comply with the more stringent of the two; \*Not applicable for OHFA HP COVID
* verification of income;
* verification that the “need-based” requirement was met, namely, that the amount of assistance provided is based on the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near term.
* verification of housing status.
* documentation that participant status was reviewed at intake and every three months thereafter by a case manager.
* Rent Reasonableness Checklist and Certification; financial assistance must be made directly to third parties, such as landlords or utility companies, not to program participants.); and
* narrative describing how the provider determined that the participant was likely to maintain housing stability after the termination of HCRP assistance.
* Documentation of a rental assistance agreement stating the level of assistance, due dates, and the agreement that the landlord will notify the program when they must evict a program participant.

# Homeless Prevention Required Documentation

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In addition to the participant file documentation include above, for HCRP-funded homeless prevention activities, the following documentation must also be maintained:

* \*lease must be current, signed prior to COVID pandemic mandate implementation (5-1-2020), and eviction arrearages must be effective AFTER 5-1-2020. Lease can be month to month, if those terms were set to month to month at onset of original terms agreement. If lease is a renewal, current & original lease are required to provide proof residency had been established prior to COVID pandemic mandate. Arrearage payments are permitted, no future rental payments are permitted;
* evidence that the participant’s housing is in immediate jeopardy; While the HUD guidance states that an eviction notice (typed or handwritten) is an acceptable form of documentation, HUD's publication does not proscribe various types of Eviction notices. In other words, it could be a letter/ notice from the owner/landlord or an official legal document. The document must minimally:
	+ Identify the HCRP applicant and unit where HCRP applicant is the leaseholder;
	+ Indicate that applicant must leave their housing; and
	+ Be signed and dated by owner/landlord or court
* if the individual/family is being evicted as a result of a family eviction, then the file must contain a family statement describing the reason for eviction, who they are evicting, the address of the unit, the date those being evicted must leave, and it must be signed and dated by the family member. (Note: An eviction notice alone is not adequate evidence that a participant is at imminent risk of becoming homeless.);
* if utility assistance is provided, the files must include a copy of the Notice of Termination from the utility provider, or some other documentation that termination of the utility is imminent and will immediately jeopardize the participant’s housing status (A Notice of Termination alone is not adequate evidence that a participant is an imminent risk of becoming homeless);
* if first month’s rent or a utility/security deposit is provided, the files must include proof of payment to the landlord and a copy of the request that a security and/or utility deposit be returned to the agency, not the participant; and
* supporting documentation regarding other types of assistance (e.g., legal assistance, etc.) provided to the participant.

# Documentation of Eligibility

HCRP award recipients and sub-recipients must assess and fully document that a participant would become homeless but for the HCRP assistance. In other words, without the HCRP assistance, the household would require emergency shelter or would otherwise become literally homeless. Participant files must include clear documentation and assessment notes that demonstrate that the household meets the Assistance Requirements outlined above and in HUD’s HCRP Eligibility and Documentation Guidance. A clear indication of eligibility must be included in each participant file to ensure that any entity monitoring the files can easily confirm participant eligibility. Periodic review of participant files by program supervisors to assure adequate and clear documentation must be conducted by the award recipient and subrecipient.

# Housing Status Declaration Form

The Housing Status Declaration form is designed to verify that an individual is currently homeless or at risk of homelessness and must be completed and signed by an authorized agency representative. Housing Status Declaration Form along with the required supporting 3rd party documentation is the preferred method of verifying homelessness or risk of homelessness; however, if there is no response within 10 business days and/or the homeless individual is not a former participant, the Self-Declaration of Hosing Status on the form may be used to verify homelessness. Accompanying documents are discussed below:

|  |  |
| --- | --- |
| **Living Situation** | **Type of Eligible Documentation** |
| Persons living on the street or sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation. | * Signed and dated written certification by person seeking services
* Signed and dated written certification by an outreach worker
 |
| Persons living in a shelter designed toprovide temporary living arrangements- congregate shelters- transitional housing- hotels/motels paid for by a charitable organization or government program. | * HMIS shelter/transitional housing record
* Written referral from previous shelter/transitional housing staff
* Written referral from charitable organization or government program
 |
| Persons exiting an institution where they resided for 90 days or less and was residing in a place not meant for human habitation immediately before entering institution. | * HMIS shelter/transitional housing record
* Written referral from previous emergency shelter stay
* Written referral from institution
 |
| Persons fleeing domestic violence. | * Written, signed and dated verification from the participant
* Written, signed and dated verification from the domestic violence service provider
 |
| Person will imminently lose primary nighttime residence within 14 days and meets both of the following circumstances, ***and***- No appropriate subsequent housing options have been identified, ***and***- Household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing. | * Court order/eviction notice or other official notice to vacate from landlord
* Eviction letter from tenant/homeowner (if living with another, i.e. doubled up)
* Letter from hotel/motel manager and cancelled checks to verify costs covered by the participant
* Documentation of efforts to divert from homelessness (contact with HPP or ESG provider)
* Letter from halfway house, jail, or state penitentiary
 |

*\*Please note, it is understood that Self-Declaration of Housing Status, while permitted in very rare cases, will* ***NOT*** *be the only documentation of a household’s risk or actual homelessness during the enrollment process.*

# Documentation of Rent Reasonableness

Award recipients and subrecipients must determine and document rent reasonableness for all units for which HCRP rental assistance (including arrears) is being provided. If the rent for the unit does not meet the rent reasonableness standard, then HCRP funds may not be used to assist the household in that unit. Further, HCRP funds cannot be used to pay the rent up to the rent reasonable standard, while the tenant pays the remainder.

Fair Market Rents (FMRs) are not applicable under HCRP. As explained in the HCRP Notice

([Fair Market Rents | HUD USER](https://www.huduser.gov/portal/datasets/fmr.html)), HCRP rental assistance may only be used to assist eligible households in units that meet rent reasonableness standards. Therefore, assistance may be provided for units that exceed the FMR as long as the rent meets the rent reasonableness standard. However, if the rent for the unit does not meet the rent reasonableness standard, then HCRP funds may not be used to assist the household in that unit (nor can HCRP funds be used to pay the rent up to the rent reasonable standard, while

the tenant pays the remainder).

# Documentation of Eviction

Documentation an eviction must be obtained to pay rental arrears (maximum of six months) to prevent an eviction and/or provide rental assistance for homeless prevention. There are 3 situations where this may occur. The following table outlines acceptable types of documentation and the documentation standard. (This item is currently being revised under ESG-please see Homeless Prevention Certification above for additional, local guidance).

|  |  |  |
| --- | --- | --- |
| **Current Living Situation** | **Acceptable Types of Documentation** | **Documentation Standard** |
| Rented by ParticipantOther Housing Occupied by Participant without paying rentPotential loss of housing due to uninhabitable conditions | Copy of notice from landlord/property manager, public health, code enforcement, fire marshal, child welfare or other government entity that housing is condemned ANDCopy of lease naming applicant as leaseholder or other written occupancy agreement identifying applicant as legal tenant of unit. | * Obtain copy of notice (may include notice published in local newspaper or government jurisdiction’s website) AND copy of lease or other written occupancy agreement
* Include notice and copy of lease in participant file.
* Notice MUST:
1. Identify the building or unit where HCRP applicant is the leaseholder or is otherwise residing
2. Indicate that housing is condemned
3. If written notice, be signed and dated by the landlord, property manager, public health, code enforcement, fire marshal, child welfare or other government entity.
 |
| Owned by ParticipantPotential loss of housing due to foreclosure on owner-occupied property\*\* HCRP does not have mortgage assistance | Copy of foreclosure notice from lending institution | * Obtain copy of foreclosure notice
* Foreclosure Notice MUST:
1. Be on institution letterhead
2. Identify the HCRP applicant and residence where HCRP applicant is the homeowner
3. Indicate that applicant must leave housing
4. Be signed & dated by financial institution
* Include foreclosure notice in participant file
 |
| **Current Living Situation** | **Acceptable Types of Documentation** | **Documentation Standard** |
| Hospital or other institutionPotential loss of housing due to institutional discharge | Written statement from hospital or other institution | * Obtain letter from hospital or other institution
* Letter MUST:
1. Be on hospital or other institution letterhead. Include statement verifying current hospital/institution stay of HCRP applicant.
2. Indicate the individual has no housing options other than emergency shelter to return to upon discharge.
3. Indicate the institution has followed all appropriate discharge procedures and cannot find housing for the individual.
4. Be signed and dated by hospital/institution representative
* Include hospital/institution letter in participant file
 |

# Rental Agreement

Per ESG, the HCRP projects may make rental assistance payments only to an owner with whom the HCRP project has entered into a rental assistance agreement. The Rental Assistance Agreement must set forth the terms under which rental assistance will be provided, including any requirements. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the HCRP project case manager a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant. *Late payments.* The HCRP project must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as stated in the program participant's lease. The HCRP project cannot pay late payment penalties with ESG funds. Due to this requirement the Rental Agreement must be completed upon program entry and last for 3 months. Upon Recertification a new rental agreement must be completed. The Rental Agreement must be signed by the landlord, participant, and case manager prior to the provision of any rental or security deposit assistance. Case Managers are required to notify the landlord in writing and verbally within 24 hours of a household’s non-compliance with the program. Case Managers must meet with the household at the minimum, every 30 days. Failure to comply results in a breach of the Services and Participation agreement and the household must be exited from the program. \*Not applicable for OHFA HP COVID

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# Documentation of Utility Disconnect/Payment of Utilities

*A utility disconnect notice or arrears statement is not sufficient by itself to document program eligibility*. In addition to conducting an assessment to determine that the household has no other financial resources support networks or other housing options, award recipients and subrecipients must also assess and document that a household with a utility disconnect notice will become literally homeless but for HCRP assistance. This means that HCRP staff must assess whether the household will lose their housing if the utility is disconnected (it will constitute a lease violation causing lease termination and/or will cause housing to be unfit for human habitation). HCRP staff must obtain a copy of the participant’s lease and highlight the provision related to utility obligations and consequences. As with other HCRP eligibility documentation, HCRP staff must first attempt to obtain third-party verification (documenting such attempts). Participant self-declaration is only acceptable if third-party documentation cannot be obtained. \*Not applicable for OHFA HP COVID

# Recertification

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All program participants must be evaluated for eligibility at least once every 90 days. The

reassessment/recertification requirement applies to all households serviced under HCRP, *including those receiving services only*. Upon reassessment, if a household no longer meets the but for requirement or other eligible requirements (e.g., income is at or above 30 percent of AMI), that household is no longer eligible for HCRP assistance. Ongoing case management for program participants must ensure the successful transition of participants to permanent, stable housing. Therefore, it is important for award recipients and subrecipients to identify an alternate funding source to provide continued support to households that have an increased income but remain precariously housed. \*Not applicable for OHFA HP COVID

# Habitability Standards

\*OHFA HP COVID does NOT require a unit inspection through March 31, 2021 per the HUD Waiver.

All units assisted under the HCRP must provide safe and sanitary housing that follows the habitability standards outlined in the federal HCRP regulations. These standards apply when a program participant is receiving financial assistance and is moving into a new (different) unit. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of HCRP assistance. Housing inspections do not apply to

persons served with HCRP prevention assistance in a unit in which the program participants are already residing. Note: Housing that is occupied by families with children under the age of 6 and that was constructed before 1978-whether served with prevention or re-housing assistance-must also comply with lead-based paint inspection requirements per the Lead-Based Paint Poisoning Prevention Act (see Lead-Based Paint section below).

The habitability standards are different from the HQS used for other HUD-funded programs. Because the HQS criteria are more stringent than the habitability standards, an award recipient could use either standard. In contrast to HQS Inspections, the habitability standards do not require a certified inspector. As such, HCRP staff could conduct the inspections, using a form such as one available in the HCRP Guidelines manual and on HUD’s website. Organizations providing rental assistance with HCRP funds will be required to conduct initial and any appropriate follow-up inspections of housing units into which a program participant will be moving. The habitability standards that award recipients must follow are:

* State and local requirements. Each award recipient or subrecipient under this Notice must ensure that housing occupied by a family or individual receiving HCRP assistance is in compliance with all applicable state and local housing codes, licensing requirements, and any other requirements in the jurisdiction in which the housing is located regarding the condition of the structure and the operation of the housing or services.

Except for less stringent variations as are proposed by the award recipient or sub-recipient and approved by HUD, housing occupied by a family or individual receiving HCRP assistance must meet the following minimum requirements:

1. Structure and materials: The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and to protect the residents from the elements.

2. Access: The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.

3. Space and security: Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

4. Interior air quality: Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.

5. Water supply: The water supply must be free from contamination.

6. Sanitary facilities: Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the

disposal of human waste.

7. Thermal environment: The housing must have adequate heating and/or cooling facilities in proper operating condition.

8. Illumination and electricity: The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient

electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.

9. Food preparation and refuse disposal: All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.

10. Sanitary condition: The housing and any equipment must be maintained in sanitary condition.

11. Fire safety:

i. Each unit must include at least one battery-operated or hard-wired smoke detector per floor, in

proper working condition, on each occupied level of the unit. Smoke detectors must be

located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is

occupied by hearing impaired persons, smoke detectors must have an alarm system

designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired

person.

ii. The public areas of all housing must be equipped with enough, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

# Lead-Based Paint Requirements

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HCRP award recipients and subrecipients must comply with the Lead-Based Paint Poisoning Prevention Act and implementing regulations at 24 CFR 35, as described in the Notice of Allocations, Application Procedures, and Requirements for HCRP award recipients under the ARRA of 2009. The lead-based paint requirement is linked to any form of financial assistance funded by HCRP and is triggered when financial assistance is offered under either the Homeless Prevention or Rapid Re-Housing program models.

Lead-based paint assessments must be completed on housing units for households with children six (6) years of age or younger who are living in, or will move into, units constructed prior to 1978. It is important to note that these lead-based paint inspections must be completed whether or not the family will retain their existing housing or move into a new rental housing unit. The inspections must be completed prior to the payment of any financial assistance, which include rental assistance, utilities assistance, utility/security deposits, and rental/utility arrears.

The lead-based paint visual assessment must be conducted by a person that has completed the HUD Certified Visual Assessor training [US Department of Housing and Urban Development - HUD - Visual Assessment Training](https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm)). Evidence that staff successfully completed this training must be maintained in HCRP files for review during site visits. The purpose of the visual assessment is to determine the level of risk of lead-based paint hazards in a unit as compared to national standards that have been deemed to pose little or no risk (de minimis) to cause health concerns. The de minimis standards are further defined in the HCRP guidance entitled “Understanding the Lead-Based Paint Requirements: Guidance for HCRP Recipients” available at [Understanding the Lead-Based Paint Requirements: Guidance for HPRP Grantees - HUD Exchange](https://www.hudexchange.info/resource/1204/lead-based-paint-requirements-guidance-for-hprp-grantees/).

It includes protocols to follow when the visual assessment identifies hazards that exceed the de minimis standards, the treatment of situations when children have known elevated blood lead levels, requirements for ongoing lead-based paint monitoring, and the responsibilities of the landlords/property managers pertaining to disclosure, remediation, and on-going lead-based paint maintenance in assisted units.

Along with conducting inspections, eligible HCRP families must be provided with the HUD lead-based paint disclosure form and a copy of the pamphlet “Protect Your Family from Lead in the Home” by the landlord/property manager. Sub recipient staff must ensure that this documentation is being maintained in the tenant files by the landlord/property manager. This document is posted on the CACFC website.

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# Guidance on HCRP Reporting for Victim Service Providers

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HUD has determined that HCRP award recipients/subrecipients that are **victim service providers** as defined by the Violence Against Women and Department of Justice Reauthorization Act of 2005 (Pub. L. 109-162) (VAWA) should NOT enter data directly in HMIS and must use a “comparable database.” **VAWA defines a**

**victim service provider as** a nonprofit or nongovernmental organization including rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. HCRP HP and RRH projects are permitted to enter DV participants in HMIS with signed Data Acknowledgement release.

*Minimal Standards for a “Comparable Database”*

Victim service providers that receive HCRP funding must submit unduplicated aggregate reports about the individuals and families served with HCRP funds to the HCRP award recipient on a quarterly basis or, if required by the award recipient, on a more frequent basis. HCRP-funded providers must also have a mechanism to track the length of assistance provided to program beneficiaries to ensure that participants are recertified every 3 months if

receiving medium-term rental assistance and that participants do not receive more than 18 months of HCRP assistance. Therefore, a victim service provider’s comparable database must collect participant-level data over time and generate unduplicated aggregate reports based on that data. It cannot be a database that only records aggregate information.

The comparable database must comply with all current HUD HMIS Data and Technical standards. As of June 2009, current applicable HMIS Data and Technical Standards include Section 1 (Introduction), Section 4 (privacy and security standards), and Section 5 (technical standards) from the 2004 HMIS Data and Technical Standards Final Notice (69 FR 146, July 30, 2004) and Section 2 (program descriptor data elements), Section 3 (universal

data elements) and Section 4 (program specific data elements) of the 2009 HMIS Data Standards. The HMIS standards also require organizations to comply with any federal, state, and local laws that require additional confidentiality protections, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164), the Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2), and VAWA.

*Minimum Data Collection Requirements for Victim Service Providers*

Victim service providers are required to collect and record all data elements that are required for HCRP funded providers on all participants served with HCRP funds in a comparable database. The participant-level data collection requirements for HCRP are specified in the 2009 Data Standards Notice. They include:

.. all universal data elements, and

.. a subset of the program-specific data elements.

In addition, all of the program descriptor data elements must be recorded about each HCRP in the HMIS (either by the HCRP-funded provider or by the HMIS system administrator) and the fields needed to correctly generate the HCRP performance reports are required to be collected in the comparable database. A mailing address (e.g., P.O. Box) or administrative office address are acceptable in lieu of a shelter’s physical address. The program descriptor data elements only need to be entered once for each program and are not repeated for each participant; however, each HCRP participant record will need to include the appropriate Program Identifier in order to correctly generate required reports. The required data elements are summarized in the 2009 Data Standards, Exhibits 1-1, 1-2 and 1-3, available at http://www.hudhre.info/documents/HCRPVictimServiceReportingGuidance.pdf.

*Suppression of Potentially Identifying Data in HCRP Annual Performance Report (APR)*

Victim service providers may suppress aggregate data on specific participant characteristics in the HCRP APR when the following two conditions are met:

1. The aggregate number of persons reported for a particular reporting field is less than either one percent of the total number of participants or five persons, whichever is greater, and

2. Provider staff reasonably believes that the inclusion of such information may constitute a threat to a participant by allowing a victim’s stalker or abuser to identify the location of a participant with an uncommon demographic profile.

For example, a victim service provider that serves only one Asian participant in a jurisdiction with a small Asian subpopulation may report that participant as having an unknown or unreported race. For more information, visit http://www.hudhre.info/documents/HCRPVictimServiceReportingGuidance.pdf.

# Required Financial Records

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Refer to OHCP’s Financial Management Rules and Regulations handbook available on their website,

[Homelessness Crisis Response Programs (HCRP) (ohio.gov)](https://www.development.ohio.gov/cs/cs_homelesscrp.htm).

# Applicable OMB Circulars

The policies, guidelines, and requirements of 24 CFR Part 85, OMB Circular No. A-87, and OMB Circular A-133, as related to the acceptance and use of HCRP grant amounts by states and units of general local government, and 24 CFR Part 84, OMB Nos. A-133 and A-122 as related to the acceptance and use of HCRP funds by private nonprofit organizations are applicable.

# Audit Requirements

Refer to the Statement of Agreement included in the Ohio HCRP grant agreement.

# Draw Requests

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Award recipients and subrecipients must develop a cash management system to ensure compliance with the 15- day rule (http://www.development.ohio.gov/cms/uploadedfiles/CDD/OHCP/FinancialManageRR\_Manual.pdf) relating to prompt disbursement of funds. Funds drawn down should be limited to amounts that will enable the award recipient to disburse the funds on hand to a balance of less than $5,000 within 15 days of receipt of any funds. Lump sum drawdowns are not permitted. Escrow accounts are permitted only in the case of rehabilitation of private property. For the purpose of the 15-day rule only, funds deposited into an escrow account will be considered expended, but it should be noted that funds may only be in an escrow account for 20 days (See Common Rule 24 CFR Part 85 and Common Rule 24 CFR Part 84 and the OHCP Housing Rehabilitation Handbook).

# Reporting Requirements

The Ohio HCRP reporting requirements are included in Attachment C and Appendix A of each Ohio HCRP award recipient’s HCRP grant agreement.

# HMIS Requirements

WellSky Systems ‘ServicePoint’ is the software used by all Ohio Balance of State COCs as the state of Ohio’s statewide Homeless Management Information System (HMIS). OHCP is the designated HMIS lead agency. All assistance provided under HCRP funding must be recorded in HMIS.

As a state, OHCP is required to pass through all non-administrative HCRP funds. Since OHCP is the balance of state HMIS administrator, licenses and associated service agreements for Service Point must be purchased by OHCP. Therefore, OHCP will use other funds for these costs. As such, only Balance of State communities may request HMIS licenses (which include costs for corresponding service agreements). If requesting such, these costs should not appear in the budget since they will not be paid with HCRP funds. Projects located in Cuyahoga, Franklin, Hamilton, Lucas, Mahoning, Montgomery, Summit and Stark Counties need to cover license/service agreement costs with other funds.

All HCRP recipients must be entered into HMIS with name, date of birth, social security number, and the complete HUD/Ohio Universal Data elements. Because of state and federal reporting requirements, all data for a service or services must be entered into HMIS completely and accurately within 5 days of the service(s) provided.

Depending on the type of service provided, other data may be required. All Balance of State subrecipients receiving funding under HCRP will receive Service Point licenses necessary to record these services. Balance of State Service Point users will receive training in the use of Service Point by COHHIO staff and be bound by and follow the same confidentiality and other policies and procedures outlined in Ohio’s HMIS Policies and Procedures Manual, available at http://www.development.ohio.gov/community/ohcp/hmisForms.htm. Specific service-related data entry training will be provided to all providers needing to record HCRP-related data. Because of state and federal reporting requirements, all data for a service or services must be entered into HMIS completely and accurately within 5 days of the service(s) provided.

Award recipients and subrecipients will be required to meet the following minimum standards for HMIS/HCRP data collection and reporting;

* enter into a HMIS/HCRP Agency Participation Agreement;
* access to a computer with a high speed Internet connection;
* at least one county assigned Access Point for Coordinated Entry requirement and;
* must ensure that those same staff members have a unique assigned email address that can be accessed regularly during work hours.

To promote coordination of benefits and necessary monitoring of HCRP requirements regarding eligibility and duration of benefits, appropriate interagency agreements will be in place and participant releases of information will be obtained so that HMIS data may be appropriately shared among HCRP subrecipients. This data may also be shared with other providers using HMIS, given appropriate agreements and the participant’s permission, to promote coordinated planning and service delivery.

# Affirmatively Furthering Fair Housing

Under Section 808(e)(5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD and OHCP require the same of award recipients and sub-recipients. Agencies will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate application and service delivery accessible to persons with disabilities; (3) providing fair housing counseling service or referrals to fair housing agencies; (4) informing participants how to file a housing discrimination complaint, including providing the toll-free number for the local Fair Housing Office; and (5) recruiting landlords and service providers in areas that expand

housing choice to program participants.

# Nondiscrimination and Equal Opportunity Requirements

Refer to the Statement of Agreement, Appendix A and Attachment D of the HCRP grant agreement.

# Lobbying and Disclosure Requirements

Refer to Attachment E of the Ohio HRPR grant agreement.

# Drug-Free Workplace Requirements

The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD’s implementing regulations at 24 CFR Part 21 apply to HCRP.

# Region 16 Subgrantee Monitoring

The Community Action Commission of Fayette County is responsible for ensuring that the HCRP requirements are met. This will be accomplished with site visits to agencies and monthly review of grant activities and reports. Monitoring of agencies may be conducted by the Community Action Commission of Fayette County, OHCP, local HUD Office of Community Planning and Development, HUD’s Office of Special Needs Assistance Programs, HUD’s Office of Inspector General, HUD’s Office of Fair Housing and Equal Opportunity, or another authorized state or federal agency to determine agency compliance with the requirements of this program.

Sub-recipients are expected to make available all participant files, and any financial and program records for periodic review on a schedule to be established by OHCP. In addition, agencies will maintain participant files in compliance with any standards set by OHCP (see Statement of Agreement in the Ohio HCRP grant agreement). To prepare for a monitoring visit, the following steps will be taken:

1. CACFC will notify the award sub-recipient in writing of the intent to conduct a monitoring. The letter will include the name of the person completing the monitoring, the date and time of the monitoring and a list of the items to be monitored during the visit.

2. CACFC staff will use a monitoring tool and make that tool available prior to the visit.

3. The award recipient must ensure that the files are complete and appropriate and that the appropriate people in the award recipient’s organization and in the administrative agency organization are available during the monitoring.

4. Subsequent to the monitoring, CACFC staff will issue a letter outlining any findings, concerns, corrective action and recommendations determined as a result of the monitoring visit.

5. The award recipient must respond to any findings and/or advisory concerns in the monitoring letter within 30 days.

6. If the audit finding remains unresolved after 30 days, the Community Action Commission of Fayette County will withhold the unresolved cost(s) from the following invoice.

Region 16 Training and Coordination

The CACFC will host training and coordination meetings for HCRP sub-recipients. Sub-recipient agencies must ensure that the appropriate people in the sub-recipient’s organization are available for training and coordination meetings.

# Region 16 Shelter Diversion Policy

Through its receipt of Emergency Solutions Grant funding, the Ohio HCRP Region 16 is committed to preventing and ending homelessness when possible. We will employ a housing first response to homelessness throughout our region. In order to ensure regional continuity and equal access to services, homeless shelter providers will divert all homeless shelter applicants to homeless prevention programs if the following conditions exist:

* The individual and/or family has not already been evicted from their rental housing through the courts OR the individual and/or family has been evicted, but may stay where they are for a limited amount of time.
* The individual and/or family has some income to cover shelter expenses with short-term assistance;
* The individual and/or family is not in danger of physical harm

Individuals and families referred from the shelter will be given priority.

All HCRP providers in the region will be required to complete the Diversion Assessment and agree to the utilization of the Coordinated Entry process.

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# Region 16 Referrals Process

Region 16 utilizes the Diversion & Coordinated Entry process as required by the state. As such, all referrals will be tracked by each county’s Access Point.

1. Homeless Prevention –
	1. Completion of Coordinated Entry (CE) File -

The CE file will include a referral through HMIS, and the file will include: the participant name, address, contact phone number(s), a verification of the housing crisis, and required PII.

At a minimum, the explanation of housing crisis for a homeless prevention referral should include number of adults and children in the household, how much income is coming into the household, a notice from the landlord as to how far behind the household is on their rent/utility, copy of signed lease, rent and utility costs, Veteran, victim, disabled, or ex-felon status, and the reason they are behind on their rent/utility.

* 1. Record Accepted or Denied Referral in the HMIS system. (referral not applicable to OHFA HP COVID).

# Region 16 Waitlist and Program Capacity Policy

Region 16 has established a case load standard of 8 households for a part time case manager (20hrs/week) and a

case load standard of 20 households for a full-time case manager (40hrs/week). Households referred to the

program while at capacity must be recorded according to the Region 16 Prioritization Policy.

Region 16 Homeless Prevention(HP) Prioritization

Homeless Prevention dollars must be targeted to households who are at-risk of literal homelessness. To be considered at-risk they must meet the following criteria: \*Directly impacted by COVID Pandemic, Has moved frequently because of economic reasons; (i.e. 2 or more times in 60 days); is living in the home of another because of economic hardship and/or has been notified that their right to occupy their current housing or living situation will be terminated within 14 days; lives in a hotel or motel paid for without a voucher or assistance; lives in severely overcrowded housing; or is exiting an institution, which is exiting an a publicly funded institution or system of care, such as a health-care facility, mental health facility, foster care or other youth facility, or correction facility and is **below 30% AMI**.

Homeless Prevention dollars will be targeted to priority areas in the following order:

1. **Seniors aged 60 and older- COVID Pandemic required**
2. **Individuals with underlying health conditions- COVID Pandemic required**
3. **Pregnant individuals- COVID Pandemic required**
4. Referrals from Access Points for diversion
5. Prior Homelessness
6. Veterans, Disabled, Domestic Violence
7. SSI Ohio Project with Case Manager Approval
8. Doubled-up in subsidized housing
9. Doubled-up with landlord statement of eviction for the host family being imminent
10. Doubled-up with mental health disabilities creating friction
11. Court ordered eviction (unless the amount is unreasonable)
12. 2 or more moves in 60 days

# Region 16 HP Enrollment Process

Agency staff must assist applicants in filling out the following documents and ensure that

all required documents are turned in prior to program enrollment. The agency must notify the participant verbally and in writing what documents are missing and a time frame for the spot to remain available to them before serving the next participant. Once approved or denied, the agency must send out either an approval letter or a denial letter. The denial letter must state the reasons for the denial and the grievance process available to the customer.

1. Homeless Prevention: Participant Required Documents\*\*
	1. Proof of temporary or permanent disability if unable to work (\*not applicable for OHFA HP COVID)
	2. Copies of most recent utility bills (\*not applicable for OHFA HP COVID)
	3. Past 12 weeks income (**Past 30 days** income for OHFA HP COVID)
	4. Copies of social security cards for the whole family and/or birth certificates
	5. ID’s for all adults
	6. Copy of signed lease (5-1-2020 or after permitted)
	7. Copy of the host family’s lease (if applicable)
	8. Documentation of Eviction
	9. Housing Status Documentation Form with 3rd party attachments
	10. Current Year W-9
	11. Utility Disconnection and supporting documentation of “but for” and ability to show number of months (\*not applicable for OHFA HP COVID)

HCRP files include six (6) tabs with competed forms as listed on each respective Tab’s Checklist. \*OHFA HP COVID will include: Tab1 Coordinated Entry, Tab 2 COVID Enrollment, and Tab 4 COVID Financial Assistance.

\*\* All participant required documents must be obtained prior to any financial requests submitted.

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# Region 16 Payments Process

Upon enrollment into the program (refer to the Enrollment Policy on pg. 34), the HCRP Case Manager will inspect the unit. Once the unit passes all inspections, the Rental Agreement and W-9 must be submitted to the landlord. The Rental Agreement covers a term of 3 months at a time. Any time financial assistance that is requested should be logged on the ‘Assistance Tracking Form’ and in HMIS under Services with the appropriate funding source. Case Managers should be aware of the amount of financial assistance they have available at all times. All financial assistance requires the household to have an active lease. There are no exceptions to this rule. It is the responsibility of the Case Manager to verify that the business or property owner name is the same on the lease. To verify ownership, use your local auditor’s website and print off ownership verification and place in Inspection tab of participant file. Payment must be made to the owner of the property as listed on the W-9. If rental payment needs sent to a location other than that listed on the W-9, the case manager must make a note at the bottom of the Check Request, DO NOT MAIL. HCRP management will give the check to the Case Manager for delivery to appropriate site.

Documents required in the Financial Assistance tab of the file are:

1. Direct Client Assistance Tracking Form
2. Budget (\*not required for OHFA HP COVID)
3. Purchase Orders
4. Check Requests
5. Rental Assistance Agreement (\*not required for OHFA HP COVID)
6. Completed W-9

Once all documentation has been provided, the HCRP management will submit the information to CACFC’s fiscal department. Payments will be made once they have gone completely through CACFC’s Fiscal Policy and Procedure. (refer to the Rental Payments Policy on pg. 34).

**Maximum number of months:** No family may receive more than 12 months of assistance within a 2-year timeframe. This includes the HCRP and any future funding provided by the Emergency Solutions Grant. Homeless Prevention participants must wait 36 months from their exit date if they have never been homeless or are not victims of domestic violence. The only exception to this policy is when the family is being referred directly from the shelter for shelter diversion. (\*not applicable for OHFA HP COVID as it is only a one-time payment of rental arrears).

**Maximum amount of assistance:** HCRP may not pay more than 6 months of rental arrearages. Furthermore, the amount of arrearages may not exceed $2,000. A household may not exceed $4,000 in rental, utility, and security deposit assistance during their time on the program. Households requesting over $2,000 of assistance must be PRE-approved by the HCRP Program Supervisor. \*COVID Pandemic HP funding requires arrearages be directly tied to COVID pandemic and cannot exceed 6 months of rental arrears. **Rental arrears must not exceed 120% of HUD Fair Market Rent for the service area**.

**Determining monthly subsidy:** Program participants must meet with the Case Manager at enrollment to discuss the amount of subsidy they will receive. HCRP will provide the least amount possible. To obtain this goal, the region utilizes the Budget Form. The Budget Form educates the participant on the amount of income required for their household to sustain their housing outside of HCRP assistance. This form allows the case manager to assist the participant in learning to budget over time. The Budget Form is in the Enrollment tab.

Security deposits and first month of assistance will be based on:

Money saved – moving expenses (based on Case Manager Assessment of participant needs)

Rental Assistance Provided = Bring Home Pay – Total Budget

\*\*Bring home pay is the amount of money the participant has after paying for taxes, child support, and insurance.

Total budget = Childcare Expense + Transportation Expense + Medical Expense + Housing Expenses + Up to $250 Car Payment + Car Insurance Expense + Discretionary Spending

Discretionary Spending = The Income Level percentage based on family type x Total Bring Home Pay

|  |  |  |
| --- | --- | --- |
| Amount | Single | Family |
| $0-$1000 | 15% | 17% |
| $1,001-$1,500 | 14% | 16% |
| $1,501-$2,000 | 12% | 14% |
| $2,000+ | 10% | 12% |

Zero Income Households: Families entering the program at zero income will be expected to pay 50% of their housing expenses within 60 days. The Case Manager will collect proof of applications for assistance and/or employment. The Case Manager may apply to the Homeless Director for waivers to the 50% rental obligation requirement given that the family is working towards the items on the action plan. (\*Not applicable to OHFA HP COVID)

# Region 16 Case Management Process

The Case Manager will determine the frequency and intensity of Case Management and

Housing Stabilization Services based upon an assessment of the household’s needs and barriers.

The program requires that the participant meet with a Case Manager, at a minimum, every 30 days.

OHFA HP COVID requires a minimum of one meeting, possibly two, to collect all required data. The

Case Manager will assist the customer in the creation of an individualized service plan or goal planning

worksheet during the Enrollment process. The individualized service plan or goal planning worksheet

should be revisited on each subsequent home visit. The Case Manager will keep detailed case notes

regarding the customer’s progress and participation, or lack thereof. The Case Manager will also track all

home visits, services, and referrals. Case notes will be reported in HMIS, under the Client Profile

Tab in the Client Notes section, within the week of the occurrence, except at the end of the month, at

which time all data must be submitted to HMIS within 48 hours of occurrence.

The following forms and documentation are required in the participant’s file throughout the

case management process:

1. Services Tracking Form – Services or Referrals provided by HCRP case manager should be tracked upon their occurrence and the outcome of the referral should be documented prior to the participant’s exit from the program or at the time of the household successfully obtaining the services for which they were referred. This must be tracked through HMIS via Case Notes and Services entry. \*Referrals not applicable through HMIS for OHFA HP COVID.
2. Self Sufficiency Action Plan – Action Plans should be updated with each visit through case notes.
3. Services Provided– Services must be recorded upon occurrence. Case Managers should document the date and time of the service, the type of service provided, and length of time spent providing service. This will be recorded in HMIS under the Services. Corresponding case notes of the service provided should be recorded in HMIS under the Client Profile tab in the Client Notes section.
4. Assistance Tracking Form, Purchase Orders, Check Requests, and Rental Assistance Agreements
5. Financial Assistance reported in HMIS using the correct funding source. OHFA HP COVID funding source is listed under Funding Source as OHFA.

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# Region 16 Recertification Process

Households must be reassessed every 90 days. Recertification documents include:

1. Past 30 days of income;
2. completed Region 16 HCRP Recertification Packet;
3. Case note documenting how the household would become homeless “but for” this assistance.
4. Documentation of recertification in HMIS through the Interim option.

\*Recertification not applicable to OHFA HP COVID

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# Region 16 Exit Process

Upon exit the following documents must be filled out:

|  |
| --- |
| 1. Exit Form
2. HMIS Exit
 |
|  |

The participant should be exit interviewed in person. However, a telephone exit is permissible. If

a participant is unavailable, program staff may contact a household member to obtain the required

information.

# Region 16 Termination Policy

If a participant does not comply with the Services and Participation Agreement, home visits, or submitting required program documentation within a 24-hour period, the Case Manager will notify the customer by a telephone call and a letter that they are not in compliance with the program rules. The landlord must be notified by a letter and a phone call within 24 hours of the notification of the program participant. The letters must state at a minimum why the participant is being terminated, the number of days the participant must respond/appeal the decision, and the name(s) of the staff member(s) who they may appeal the decision. If the participant does not agree with the decision to terminate their participation in the program, they may utilize the HCRP Grievance Procedure for a remedy of the situation. All participants must have access to this policy by either providing the policy upon program enrollment or posting the policy in a public location (provided on CACFC website).

Region 16 Approval/Denial Policy

Denial of assistance may include participant ineligibility, failure to provide verifiable evidence of eligibility, scoring outside of the Region 16 SPDAT, or fraudulent representation of the applicant’s documentation or information provided during the referral and assessment process. Applicants will be given letters detailing the documentation required to make an eligibility determination and a time frame for submitting those documents. Once an applicant has passed the time frame or has been determined ineligible for the program, staff will inform the applicant in writing the reasons for the determination and provide information regarding how the applicant may file a grievance. If the customer does not agree with the decision, they may utilize the HCRP Grievance Procedure for a remedy of the situation. All applicants must have access to this policy by either providing the policy upon program enrollment or posting the policy in a public location. Applicants must receive an approval or denial within 20 business days from their application to the program.

# Region 16 Grievance Policy

SCOPE AND PURPOSE: The Region 16 HCRP will provide potential, current, or former participants an opportunity to address any concerns and/or decisions made by Region 16 HCRP staff in relation to their individual case or general operations. The Grievance Policy must be posted or given to potential, current, or former participants.RESPONSIBILITIES:

Agency Administration and Employees shall:

* Region 16 HCRP will make available to participants, potential participants, and other interested parties the Participant Rights, Appeals and Grievances Policies.
* It is the intent of Region 16 HCRP Staff that participants be always treated with respect and that current circumstances will be kept in the strictest confidence.
* A copy of this policy shall be posted on the bulletin board and is on CACFC website.
* All participants will be informed of their rights at intake.
* Participants may be given a copy and explanation of the participant’s rights policy upon request.
* All employees will receive orientation regarding the agency’s policy on participant’s rights and grievance procedures.
* If the complaint is the result of a participant being EXITED, a 48-hour extension may be granted while the Region 16 HCRP Director makes a decision, unless the reason for exit was a safety violation (violence, drug use on premises, etc.)
* Each participant shall have the right to express his/her feelings concerning his/her dissatisfaction with the Policies and Procedures of the Agency in an appropriate manner.
* There are three (3) steps to the grievance process:
1. Discuss the matter with a staff member involved. Open discussion will usually clear up the misunderstanding and solve the problem. If the matter remains unresolved, go to the next step.
2. Request a complaint form and complete it. Forward the report to the HCRP Director. If you are unable to fill out the complaint form, you may request a meeting with the HCRP Director. She/He will review the complaint and respond in writing to the participant within five (5) working days of receipt of the report. If the participant remains dissatisfied with the resolution offered, she/he may take the next step. \*\* or in the case that the grievance is with the HCRP Director move to step 3.
3. Request that the complaint form be forwarded to the Executive Director for review. She/He will take one of the following two (2) steps:
	* + Give the participant a written response which would indicate the final disposition; or
		+ Call a conference for the parties involved in the incident(s). The final disposition will be issued within five (5) working days of the conference.
4. If the decision is not satisfactory, you may file a request for an administrative appeal. Submit your written appeal, along with the response of the agency to **Patrick Hart** at 77 S. High Street, P.O. Box 1001 Columbus, OH 43216.

# Region 16 Reporting Requirements

The Ohio Department of Development pulls reports from HMIS quarterly. To facilitate early detection of data quality issues the Community Action Commission of Fayette County will monitor the following reports monthly:

**Enrolled Reports** – HMIS provides various reports through R Minor Elevated to help projects maintain their entered data is correct and current. The ‘Client Counts’ report provides the entry date, move in date and HMIS # of HH’s currently enrolled in the project. Case managers will run this report at the end of each month to ensure current HH eligibility and recertification needs (if applicable). The “COC-APR’ report in HMIS provides a list of all data errors for the project it is ran for, as does the ‘Provider Level’ report in R minor Elevated. Case Managers will run both reports at the end of each month to ensure their HMIS data is accurate. This is a total of three (3) reports run at the end of each month by HCRP case managers.

**Board Report** – The Community Action Commission of Fayette County holds board meetings the second Wednesday of each month. Board Reports from partnership counties are due no later than 12:00 P.M. on the 1st Wednesday of the month.

**Financial Reports** – Sub recipients who utilize GMS are asked to provide the following each quarter: An R&E Report, Cost Summary, and Program Check Listing. Sub recipients who do not operate on GMS will be provided with sample GMS Reports and must create a similar report utilizing their financial management software. In addition to the aforementioned reports, sub recipients must also submit copies of all invoices (receipts, purchase orders, check requests, vouchers, etc.), copies of cancelled checks, and copies of time sheets, number of households served with funds, and invoices. If the cancelled check has not been received, all documentation should be submitted the following quarter when all items to support the spending have been received. Failure to submit fiscal reports by the 25th of the month will result in the invoice being processed the following quarter.

Rent Assistance Payments – The HCRP will provide frequent reports on Rental Assistance payments made from HCRP or OHFA HP COVID to Case Manager and their supervisors.

Enrollment Approvals Policy

All HCRP files must be uploaded in HMIS under the Client Profile tab in the File Attachments section to be considered for review. The CACFC HCRP management staff will review all enrollment or financial requests every Tuesday and Thursday. Any incomplete files will not be approved until they have been properly submitted, meaning all forms have been filled out in their entirety, required housing status documents are provided, and all program documentation guidelines have been met. HCRP management will review the submission and send a copy of the signed Staff Certification to the Case Manager when approved.

Rental Payments Policy

The CACFC HCRP management staff will review all enrollment or financial requests every Tuesday and Thursday. For all financial requests, the Inspection Tab and Financial Assistance tabs (as applicable) must be uploaded into HMIS under the Client Profile Tab in the File Attachments section. *ALL rental assistance requests require a copy of the signed lease*. HCRP management will review the tab(s) and once approved, HCRP management will sign the Purchase Order (P.O.) and submit it to the CACFC fiscal department. When the CACFC fiscal department returns the processed P.O., HCRP management will provide a copy of that processed Purchase Order to the Case Manager. HCRP management will attach a copy of the processed P.O. to the submitted Check Request provided in the Financial Assistance tab and submit it to the fiscal department for payment. All documents returned to case manager should be placed in the participant file.

# Confidentiality Policy

HCRP staff has access to personally identifying information (PII), financial information, participant information, and other information that must be kept confidential. It is essential that all employees have the commitment to confidentiality. HCRP staff is required to protect all confidential information, file it properly while not in use, and only discuss such information with those who have a legitimate need to know. Information in participant files, either electronic or hard copy, shall not be given to any outside agency or person unless the participant whose file is involved gives written, signed authorization. Participants are prohibited from reviewing records other than their own.

# Confidentiality Procedures

* Do not disclose to anyone the name and identity of participants unless it is necessary for the purpose of providing services. Take caution of disclosure to family, friends or other agencies.
* Do not discuss a participant situation with non-staff. This includes telephone calls or messages from participants. Be especially careful about discussing a participant or his/her situation openly in front of others.
* Do not leave telephone messages, notes or faxes in an open area where they can be read.
* Do not leave electronic participant files or e-mail messages open on a computer screen. Then the staff member is finished with the file, the document must be closed.
* All participant and personnel files must be kept in cabinets away from public access.
* Incoming fax messages with participant information shall be immediately removed from the fax machines, closed so that the information cannot be read, and given to the person to whom the fax is addressed.

# Termination of Partnerships

This MOU may be terminated by either party within 14 days by written notice. The Community Action Commission of Fayette County may terminate for any of the following occurrences:

1. Failure of the sub-grantee to fulfill in a timely and proper manner any of its obligations under this Policy and Procedure Manual.
2. Failure of the sub-grantee to submit reports that are complete, accurate, and on time.
3. Failure of the sub-grantee to use the Grant Funds for the stated purposes in the Agreement.
4. Excessive staff turnover.

**Region 16 HCRP Homeless Prevention Policy & Procedure manual**

**Manual Acknowledgement Form**

This Homeless Prevention policy and procedure manual has been prepared for your information and understanding of the policies, procedures, and requirements of the Region 16 Homeless Prevention Program \*with COVID Pandemic Standards manual. Please read it carefully. Upon completion of your review of this manual, sign the statement below, and return it to the HCRP Coordinator, Dreama Brown, by the due date provided. A copy of this acknowledgment appears at the back of the manual for your records.

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, have received and read a copy of the Community Action Commission of Fayette County’s Region 16 HCRP HP Policy and Procedures \*with COVID Pandemic Standards Manual which outlines the goals. policies, procedures, and requirements of the HCRP HP and COVID HP, as well as my responsibilities as an employee and/or subgrantee.

I have familiarized myself with the contents of this manual. By my signature below, I acknowledge, understand, accept and agree to comply with the information contained in the Homeless Prevention Policies and Procedures \*with COVID Pandemic Standards manual provided to me by the Community Action Commission of Fayette County. I understand this manual is not intended to cover every situation which may arise, but is simply a general guide to the goals, policies, procedures, and requirements of the Community Action Commission of Fayette County, Ohio Development Services Agency, and the Department of Housing and Urban Development.

I understand that if I have questions or concerns at any time about the manual, I will consult my immediate supervisor and/or HCRP Director or Coordinator for clarification.

I understand that the Homeless Prevention Policies and Procedures \*with COVID Pandemic Standards Manual provided to me by the Community Action Commission of Fayette County is not a contract and should not be deemed as such.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
(Signature)

Please return by: February 1, 2021