Christina Blair

Community action commission of fayette county

Region 16 Permanent Supportive Housing

Program Policies

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# Introduction

## Program Summary

Community Action’s PSH programs are federal programs funded by the U.S. Department of Housing and Urban Development (HUD) designed to provide permanent rental subsidies and supportive services to homeless individuals with disabilities. Community Action’s PSH programs is administered by the Community Action Commission of Fayette County (CACFC). Following a Housing First model, Community Action’s PSH programs recipients are encouraged, but not required to accept the provision of services to go hand in hand with the voucher.

The collaboration of faith-based, government and nonprofit programs is the backbone of Community Action’s PSH programs. Program participants are encouraged to work towards greater stability and self-sufficiency by developing short and long term goals with their Case Manager. The Case Manager assists individuals with various housing related needs including communication with their landlord. Participants are supported in pursuing treatment, case management, educational and job training opportunities, if they choose.

Eligibility: all individuals participating in Community Action’s PSH programs must meet the homelessness and disability criteria as defined by HUD. Program participants pay 30% of their gross income towards rent and Community Action’s PSH programs subsidizes the remaining portion of the rent. Participants are able to choose their own living units, provided the units meet Housing Quality Standards and fall within the Fair Market Rent established for the area by HUD.

Community Action’s PSH programs vouchers are ‘Tenant-Based’ or ‘Project-Based’, depending on the program. Tenant-based (Shelter Plus Care, Stable Futures, and CAC PSH (AKA Destination HOME) are vouchers may be utilized within Fayette County. The programs encourage community integration and choice. Fayette Landing and Fayette Inn are project-based. This means the voucher is attached to their specific unit.

## Purpose of Manual

The Community Action’s PSH programs Policies and Procedures Manual is designed to provide program staff information regarding HUD, COHHIO, and the CACFC requirements. Staff must review this document closely to ensure full understanding of the HUD income eligibility determination requirements, housing status eligibility determination and appropriate documentation.

## Other Policy and Procedure Resources

In addition to the manual, CACFC staff is strongly encouraged to visit HUD’s website https://www.hudexchange.info/ regularly, as HUD continues to revise aspects of their programs. Also, staff should be on the Balance of State Continuum of Care’s listserv, giving them access to Continuum-wide policies that must be followed. More COHHIO information and policies can be accessed at http://cohhio.org/member-services-2/boscoc/. Program staff should consider HUD and COHHIO’s website as the primary source of SHP information. CACFC’s requirements must be in compliance with their standards, but there is some leeway for local decision-making. As such, please speak with your program manager and refer to this manual for specific program implementation details.

Housing First  
Community Action’s PSH programs, per HUD and BOSCOC requirements, must be housing first. Housing first is defined below.

Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were “ready” for housing. By contrast, Housing First is premised on the following principles:

* Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
* All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period of time, while others may need more intensive and long-term supports.
* Everyone is “housing ready.” Sobriety, compliance in treatment, or even criminal histories are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be “consumer ready.”
* Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
* People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
* The exact configuration of housing and services depends upon the needs and preferences of the population.

Based upon these philosophies, CAC PSH must utilize housing first practices and be fully compliant with the Homeless Program Standards. This means adhering to housing first practices throughout the duration of assistance, including at program entry, after enrollment, and upon case closeout.

Acceptance into an RRH project cannot be denied for the following: zero income, the individual or family refuses to accept services beyond the monthly case management requirement, sobriety, or criminal history. Basically, staff can only focus on HUD’s eligibility criteria.

Leases and occupancy agreement cannot include provisions that would not be found in a standard rental agreement. For example, a landlord may not require that the renter participate in supportive services as a condition of their lease.

CACFC housing first programming must include the following elements:

* Rapid exits from homelessness (not waiting for them to obtain income or prove readiness)
* Minimal barriers to program entry. We can conduct background checks, but unless there is a pattern of violent and sexual offenses.
* Voluntary supportive services. Clients cannot be required to meet with staff more than once a month to participate in a reassessment of service needs. Not making progress on their housing stability plan or applying for benefits is not a reasonable reason to exit someone from the program. This does not mean that we do not offer services! Program participants should be aware of everything the Case Manager can do for them. Examples include: credit repair and budget counseling, life skills assistance, linkage to employment and income supports, and referral to services based upon individual needs.
* Housing focused assistance. Programs should not be working to address personal issues unless they are chosen by the client or directly connected to helping the client obtain or maintain housing.

# Referrals

Regional Homeless Service Coordination & Coordinated Entry  
Community Action’s PSH programs, per the BOSCOC’s Homeless Program Standards, must participate in the region’s homeless service coordination plan and the associated regional coordinated entry process. In Region 16 this means that staff will accept the common assessment forms and HMIS referrals from providers participating in coordinated entry. When possible, efforts should be made to pull the original assessment from HMIS or obtain it from the referring partner, should such an assessment exist. This is to reduce duplication of efforts and minimize the customer having to repeat their story on multiple occasions to receive assistance. Rejections of referrals must be communicated to the provider and client in writing within 24 hours of rejection. If an individual qualifies and there are openings in the program, program staff must assess the potential participant within 7 days, per the region’s homeless services coordinated plan.

## Referrals Process

Community Action’s PSH programs staff will track all referrals to the program through HMIS referrals as completed through the Coordinated Entry process.

**Completion of the Initial Referral Form -**

The initial referral form should include: the client name, location and/or alternate address, contact phone numbers, alternate phone numbers, source of the referral, an explanation of the homeless/housing situation, whether or not the person was deemed acceptable for the program and moved forward to assessment, an explanation of why they were not assessed (if applicable), and where the customer was referred.

At a minimum, the explanation of the homeless/housing situation for a referral should include: number of adults and children in the household, how much income is coming into the household, whether or not the household may put utilities in their name, and whether or not the household owes any back bills. The Case Manager should also screen for the household meeting the chronic homeless definition. All attempts to contact the household should be documented on the form and include the date, time and name of the person attempting to contact the applicant.

If the individual/family referred is coming from the streets or place not meant for habitation, the Case Manager must collect their length of time homeless and complete the appropriate VI-SPDAT.

Record Referral in the Referrals excel file or similar document. This document provides important information regarding the source of referrals and the needed capacity to serve additional households.

Referrals for service must be responded to within twenty-four hours to the provider referring and the client, in writing. Case Managers should document all attempts to notify the client in writing when the individual does not have an address for receiving mail.

Service Area  
Preference will be given to chronically homeless individuals in Fayette County. However, if there are no chronic homeless within Fayette County, the Case Manager may partner with its regional partners in Clinton, Highland, Ross, and Pickaway Counties to serve chronically homeless individuals in units within Fayette County.

Prioritization

Region 16 PSH programs will prioritize chronically homeless individuals/families first, in all cases, and follow the order of priority described in detail below. Furthermore, when multiple chronically homeless are identified, those individuals/families with the longest histories of homelessness and with the most severe service needs will be prioritized before other chronically homeless with less severe needs and/or shorter histories of homelessness. Per the BOSCOC Coordinated Entry Standards, Region 16 must form a PSH Prioritization workgroup that meets monthly. This workgroup is comprised of all the emergency shelter and permanent supportive housing providers in the service area. The Prioritization List must be available for review at the monthly meeting following the full local Continuum of Care meeting. Regional partners have the option of calling in via a conference call. In cases where an eligible chronically homeless veteran has been identified, and that veteran is not eligible for VA programs, PSH program providers will prioritize the homeless veteran for assistance. Prioritizing PSH units for chronically homeless means implementing an admissions preference for those persons meeting the chronic homelessness criteria. All Ohio BoSCoC PSH projects - both those that are dedicated to serving chronically homeless persons and those that prioritize serving chronically homeless persons - must use the following order of priority for identifying who should be served. To adhere to the order of priority, PSH projects would first seek to identify a homeless person on their waitlist who meets the First Priority under the Chronically Homeless Order of Priority for PSH Projects section below. If no one who meets that priority can be found within a reasonable amount of time, then the PSH project may move to the second priority, and on down from there. The order of priority is as follows:

Chronically Homeless Order of Priority for PSH Projects

1) First Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness AND the Most Severe Service Needs

1. Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, where the cumulative total length of the four occasions equals at least 12 months; AND
2. Have been identified as having the most severe service needs as evidenced by a history of high utilization of crisis services, including but not limited to, emergency rooms, jails, and psychiatric facilities, or significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing
3. PSH projects should use their regional coordinated entry assessment tools to

determine the service needs of potential chronically homeless participants. Results of assessment may be combined with knowledge of crisis services utilization to determine prioritization based on service needs.

ii. And meet all other elements of the chronically homeless definition

2) Second Priority – Chronically Homeless Individuals and Families with the Longest History of Homelessness

1. Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, where the cumulative total length of the four occasions equals at least 12 months

i. And meet all other elements of the chronically homeless definition

3) Third Priority – Chronically Homeless Individuals and Families with the Most Severe Service Needs19

a) Have been identified as having the most severe service needs as described in paragraph (1b)

above

i. And meet all other elements of the chronically homeless definition

4) Fourth Priority – All Other Chronically Homeless Individuals and Families

a) Have been homeless for at least 12 months either continuously or on at least four separate occasions in the last three years, where the cumulative total length of the four occasions equals at least 12 months

i. And meet all other elements of the chronically homeless definition

The centralized waitlist will be maintained in the Homeless Management Information System (HMIS) in the Advanced Reporting Tool. The report is called the RRH and PSH Prioritization List. Victims of domestic violence from VAWA funded programs may not be entered into HMIS. As such, the PSH workgroup should manually add those individuals to the prioritization list.

The service area for the Community Action’s PSH programs program is Fayette County, Ohio. However, if there are no chronic homeless within Fayette County, the Case Manager may request to expand the parameters for the PSH HMIS Prioritization Report to include chronic homeless individuals from other counties. Individuals will be offered the spot in order of the greatest service needs and longest homeless histories, based upon the prioritization ranking below:

PSH staff must first consider the eligibility priority for the program. If the project only serves singles, PSH staff would not place a family in a single’s unit.

1. Chronically homeless individuals/families with the most severe service needs and/or VI-SPDAT score.
2. Chronically homeless individuals and families with the longest history of homelessness.
3. All other chronically homeless individuals and families.
4. Homeless individuals and families with a disability with the most severe service needs and/or VI-SPDAT score.
5. Homeless individuals and families with disabilities with long periods of continuous or episodic homelessness.
6. Homeless individuals and families with disabilities coming from places not meant for human habitation (coming from the streets).
7. Homeless individuals and families with disabilities coming from emergency shelters.

The CoC is dedicated to eradicating veteran homelessness and putting an end to domestic violence. CACFC will prioritize veterans over non- veterans and victims over non-victims in each prioritization category listed above. Essentially, this means that if two households present for assistance and both fall under the same order of priority (e.g. both chronically homeless and fall under Priority 1), but one is a veteran household or victim of domestic violence and the other is not, the veteran household should be prioritized first. In general, the CAC will prioritize veteran households that are not eligible for VA housing or services. If we have both a Veteran and a domestic violence victim in the same category with the same VI-SPDAT score, we will serve the victim of domestic violence first.

# Eligibility

The Community Action’s PSH programs program requires that participants in the program meet the following criteria:

* Homeless, as defined by the U.S. Department of Housing and Urban Development; and
* Disabled, as defined by the U.S. Department of Housing and Urban Development]; and
* Chronically Homeless, as defined by the U.S. Department of Housing and Urban Development]; and
* The household’s annual income may not exceed 35% AMI, as established by the U.S. Department of Housing and Urban Development.

## Homeless Definition

To be considered homeless for the purposes of this program, an individual must be homeless under category 1 of the Homeless Definition Final Rule published in 2011.

More specifically, an individual or family is considered homeless if he/she/they:

* Have a primary nighttime residence that is a public or private place not meant for habitation;
* Are living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters and hotels/motels paid for by charitable organizations or by federal, state, and local government programs); or
* Are exiting an institution where they resided for 90 days or less and who resided in emergency shelter or place not meant for habitation immediately before entering the institution.

## Chronically Homeless Definition

1. A homeless individual with a disability that meets the following requirements:

* Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
* Has been homeless continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
* Occasions separated by a break of at least seven nights
* Stays in institution of fewer than 90 days do not constitute a break

1. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph 1 of the definition, before entering the facility; or
2. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs 1 or 2 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

## Disability Definition

A diagnosable substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments from a brain injury, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions. A disability limits an individual’s ability to work or perform one or more activities of daily living.

## Income

Income must be at or below 35% AMI. More details to follow in the sections below.

## Family Composition

Community Action has several homeless programs dedicated to permanent supportive housing. All CAC PSH requires household income to be at or below 35% AMI. All PSH programs must also prioritize the chronically homeless. That means as long as chronically homeless are on the PSH prioritization list, CAC staff must serve them first, even if they are placing them at Fayette Inn, which does not have chronic homelessness as an entry criteria. However, some programs have specific unit configurations and family type eligibility criteria:

Fayette Inn – Fayette Inn residents must have a disability and be single individuals. They must Score 8+ on the VI-SPDAT. Please see the discussion above for Rapid Re-Housing regarding exceptions to this rule.

Fayette Landing and Shelter Plus Care – Fayette Landing must also be single individuals. They must also meet the chronic homeless definition. (See next page for documentation standards and definition of chronic homelessness.) They must Score an 8 or higher on the Single VI-SPDAT.

CAC PSH (Destination HOME in HMIS) – This project can serve individuals and families. They must also Score 8+ on the VI-SPDAT and meet the chronic homeless definition.

Stable Futures – This project can serve chronically homeless families with children that Score 8 or more on the VI-SPDAT.

CAC staff may not place any additional program criteria for program entry than indicated in HUD’s eligibility definition and the target population listed (singles or families) in the grant application.

Staff should also refer to the Equal Access Rule, later in this manual.

Please review the upcoming pages for infographics on HUD homeless and chronic homeless program eligibility criteria.





Income Definition   
Per 24 CFR 5.609 annual income includes:

*Annual income* means all amounts, monetary or not, which:

**(1)** Go to, or on behalf of, the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) head or spouse (even if temporarily absent) or to any other [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member; or

**(2)** Are anticipated to be received from a source outside the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) during the 12-month period following admission or annual reexamination effective date; and

**(3)** Which are not specifically excluded in [paragraph (c)](https://www.law.cornell.edu/cfr/text/24/5.609#c) of this section.

**(4)** [Annual income](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) also means amounts derived (during the 12-month period) from assets to which any member of the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=4&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) has access.

[**Annual income**](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609)**includes, but is not limited to:**

**(1)** The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services;

**(2)** The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=5&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609);

**(3)** Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in [paragraph (b)(2)](https://www.law.cornell.edu/cfr/text/24/5.609#b_2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=7&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609). Where the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=6&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) has [net family assets](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=ce94cf759aabb68bb12c33774bbe4977&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) in excess of $5,000, [annual income](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=4&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) shall include the greater of the actual income derived from all [net family assets](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=ce94cf759aabb68bb12c33774bbe4977&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) or a percentage of the value of such assets based on the current passbook savings rate, as determined by [HUD](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=4b78e5fd2284e72f267e7c82c1664dd7&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609);

**(4)** The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, [disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=f4ceee89072bc47396ca70d62683a566&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in [paragraph (c)(14)](https://www.law.cornell.edu/cfr/text/24/5.609#c_14) of this section);

**(5)** Payments in lieu of earnings, such as unemployment and [disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=f4ceee89072bc47396ca70d62683a566&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) compensation, worker's compensation and severance pay (except as provided in [paragraph (c)(3)](https://www.law.cornell.edu/cfr/text/24/5.609#c_3) of this section);

**(6)*Welfare assistance payments.***

**(i)** [Welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) payments made under the Temporary Assistance for Needy Families (TANF) program are included in [annual income](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=5&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) only to the extent such payments:

**(A)** Qualify as assistance under the TANF program definition at [45 CFR 260.31](https://www.law.cornell.edu/cfr/text/45/260.31); and

**(B)** Are not otherwise excluded under [paragraph (c)](https://www.law.cornell.edu/cfr/text/24/5.609#c) of this section.

**(ii)** If the [welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the [welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) agency in accordance with the actual cost of shelter and utilities, the amount of [welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=4&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) income to be included as income shall consist of:

**(A)** The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

**(B)** The maximum amount that the [welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=5&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) agency could in fact allow the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=8&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) for shelter and utilities. If the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=9&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609)'s [welfare assistance](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=443faab7f748b4d4aef4afa0e6502294&term_occur=6&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

**(7)** Periodic and determinable allowances, such as alimony and [child](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling;

**(8)** All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in [paragraph (c)(7)](https://www.law.cornell.edu/cfr/text/24/5.609#c_7) of this section).

**(9)** For section 8 programs only and as provided in [24 CFR 5.612](https://www.law.cornell.edu/cfr/text/24/5.612), any financial assistance, in excess of amounts received for tuition and any other required fees and charges, that an individual receives under the Higher Education Act of 1965 ( [20 U.S.C. 1001](https://www.law.cornell.edu/uscode/text/20/1001)*et seq.*), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 ( [20 U.S.C. 1002](https://www.law.cornell.edu/uscode/text/20/1002))), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered [annual income](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=6&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) for persons over the age of 23 with [dependent](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=b5b48b7d0445b3d9adeb245b41bf99f0&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) children. For purposes of this paragraph, “financial assistance” does not include loan proceeds for the purpose of determining income.

**Per 24 CFR 5.609** [**annual**](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=aa6f232520a34c1f6cda15b7fa36d2ca&term_occur=7&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609)**does not include the following:**

**(1)** Income from employment of [children](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) (including foster [children](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609)) under the age of 18 years;

**(2)** Payments received for the care of foster [children](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=4&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) or foster [adults](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=531216b84dc64d61f88de6c8709e02fe&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) (usually persons with disabilities, unrelated to the [tenant](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=ae446c33a0510a20363d26c1736ed28a&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=10&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609), who are unable to live alone);

**(3)** Lump-sum additions to [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=11&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in [paragraph (b)(5)](https://www.law.cornell.edu/cfr/text/24/5.609#b_5) of this section);

**(4)** Amounts received by the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=12&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) that are specifically for, or in reimbursement of, the cost of [medical expenses](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7d7075e67fb162a87fdb90ad0e62fede&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) for any [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=13&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member;

**(5)** Income of a [live-in aide](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=158b1fb3d4e4ed8b6eeca036b2b48bef&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609), as defined in [§ 5.403](https://www.law.cornell.edu/cfr/text/24/5.403);

**(6)** Subject to [paragraph (b)(9)](https://www.law.cornell.edu/cfr/text/24/5.609#b_9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;

**(7)** The special pay to a [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=14&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member serving in the Armed Forces who is exposed to hostile fire;

**(8)**

**(i)** Amounts received under training programs funded by [HUD](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=4b78e5fd2284e72f267e7c82c1664dd7&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609);

**(ii)** Amounts received by a person with a [disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=f4ceee89072bc47396ca70d62683a566&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

**(iii)** Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, [child](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=5&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) care, etc.) and which are made solely to allow participation in a specific program;

**(iv)**   Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed $200 per month) received by a resident for performing a service for the [PHA](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=794e2f166aa5bcbe316c6d2d136fe39d&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) or [owner](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=83e2247c09e68e7f64d516dee33f465a&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609), on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the [PHA](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=794e2f166aa5bcbe316c6d2d136fe39d&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609)'s governing board. No resident may receive more than one such stipend during the same period of time;

**(v)** Incremental earnings and benefits resulting to any [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=15&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=16&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=17&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member participates in the employment training program;

**(9)** Temporary, nonrecurring or sporadic income (including gifts);

**(10)** Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;

**(11)** Earnings in excess of $480 for each [full-time student](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=e132ce82a3079046b7165e99f5be7daa&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) 18 years old or older (excluding the[head of household](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=337d6674735be05e070188a401e99411&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) and spouse);

**(12)** Adoption assistance payments in excess of $480 per adopted [child](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=7bff373a3ba18159d422b8e8cb350582&term_occur=6&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609);

**(13)** [Reserved]

**(14)** Deferred periodic amounts from supplemental security income and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred [Department](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=acb71a9555a0d55791a69b87583c674f&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) of Veterans Affairs [disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=f4ceee89072bc47396ca70d62683a566&term_occur=4&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) benefits that are received in a lump sum amount or in prospective monthly amounts.

**(15)** Amounts received by the [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=18&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

**(16)** Amounts paid by a State agency to a [family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=a778dad7002b5a0b31caff46489e5221&term_occur=19&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) with a member who has a developmental [disability](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=f4ceee89072bc47396ca70d62683a566&term_occur=5&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) and is living at home to offset the cost of services and equipment needed to keep the developmentally [disabled family](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=930afbb8b3634c3cdf8d0edb0528f4b3&term_occur=1&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) member at home; or

**(17)** Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in [24 CFR 5.609(c)](https://www.law.cornell.edu/cfr/text/24/5.609) apply. A notice will be published in the Federal Register and distributed to [PHAs](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=794e2f166aa5bcbe316c6d2d136fe39d&term_occur=3&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) and housing [owners](https://www.law.cornell.edu/definitions/index.php?width=840&height=800&iframe=true&def_id=83e2247c09e68e7f64d516dee33f465a&term_occur=2&term_src=Title:24:Subtitle:A:Part:5:Subpart:F:Subjgrp:19:5.609) identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary.

## Asset Definition

**Assets Include:**

1. Current amounts in savings accounts and the average balance for the last six months for checking accounts. Also include cash held at home or in a safe deposit box.
2. Cash value of revocable trusts. A revocable trust can be changed by the grantor at any time and is therefore counted as an asset.
3. Equity in real property or other capital investments. Equity is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset.
4. Stocks, bonds, Treasury Bills, certificates of deposit, money market funds.
5. IRA, Keogh and similar retirement savings accounts, even though the withdrawal would result in a penalty.
6. Some contributions to company retirement/pension funds. Include contributions while an individual is employed, count only the amount the family can withdraw without retiring or terminating employment. After retirement or terminating, count as an asset any amount the employee elects to receive as a lump sum.
7. Surrender value of whole life or universal insurance policy.
8. Personal property held as an investment (such as jewelry or antiques).
9. Inheritances, lottery winnings, capital gains, insurance settlements and other lump sum amounts are considered assets.
10. Mortgages or deed of trust held by a family member. The value of the asset is determined by calculating the unpaid principal at the end of the 12-month period following certification. Each year this balance will decline as more principal is paid off.

**Assets DO NOT Include:**

1. Personal property not held as an investment.
2. Assets that are a part of an active business or farming operation. Note: Rental properties are considered personal assets held as an investment rather than business assets unless real estate is the tenants’ main occupation.
3. Assets a tenant legally owns but are not accessible by the tenant (e.g., a battered spouse owns a home with her husband, but because of the domestic situation, she receives no income from the asset and cannot convert it to cash).
4. Assets that are not effectively owned by the applicant (i.e., when asset is held in tenant name). But:
5. Asset and income from the asset accrue to someone else, and
6. That other person is responsible from paying taxes on the income.
7. Not to be confused with joint ownership.
8. Value of life insurance policies.
9. Interest in Indian trust lands.
10. Equity in cooperatives in which the family lives**.**

# Documentation of Eligibility

## Documentation Standards – Homeless & Income

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 COC staff or via the applicant is most preferred. Written third party documentation may include completion of a standardized form, such as the “COC Verification of Income” and “COC Homeless Certification” templates.

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 COC staff. Oral third-party verification is acceptable only if written third-party verification cannot be obtained. COC staff must document reasons why third-party written verification could not be obtained in the COC participant file. Note: This is different from applicant self-declaration of income. If an applicant orally declares income, it would 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 written or verbal third-party verification cannot be obtained. COC staff must document reasons why third party written or oral verification could not be obtained in the COC participant file.

The Case Manager 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.

## Homeless Documentation

The Case Manager must document the individual’s homelessness prior to entry into the program. This should be done by third-party documentation. Third party documentation sources include outreach workers or other professional sources, such as probation officers, homeless program staff, case workers, clergy, etc. Utilize the Region 16 Homeless Certification Form to document the most recent episode of homelessness. Homeless documentation follows the same 3-tiered and documented process that was just mentioned in income documentation in the prior section. Before a self declaration can be used all other attempts at 3rd party documentation must be attempted and documented.

## Income Calculation

When calculating income based on hourly, weekly or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

* Hourly Wage multiplied by Hours Worked Per Week multiplied by 52 weeks;
* Weekly Wage multiplied by 52 weeks;
* Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods;
* Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods; or
* Monthly Wage multiplied by 12 months.

### Verification of Income

This form must be completed by the employer and/or the agency providing assistance and mailed or faxed directly to the requesting agency. *The form should not be hand delivered by the COC applicant.*

The Verification of Income form is the preferred method of verifying income; however if there is no response within 10 business days, the Self-Declaration of Income form, may be used. If the Self-Declaration of Income form is used, COC staff must document in the client’s file the attempt to obtain a third-party verification. NOTE: Individuals/families completing the Self-Declaration of Income form must document with check stubs, SSI statements, etc. In addition, an individual/family must complete a Self-Declaration of Income form if they have no source of income.

### Timeliness of Income Documentation

The definition of income for the COC 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 COC. 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.

### Income Limits

All applicants for COMMUNITY ACTION’S PSH PROGRAMS are subject to the HUD Income Limits for Very Low Income. HUD Income Limits are specific to geographical areas and number of persons in the family. The Income Limits are updated every year. Income for each applicant must fall at or below the Very Low Income Limit in order to be eligible for COMMUNITY ACTION’S PSH PROGRAMS.

For the most up to date income limits, please use the following Ohio Development Services Agency web link: <https://development.my.salesforce.com/sfc/p/#d0000000etTh/a/t00000000yaw/KA7UCtseCyWesl5KCK8edYYLgrplc8qI30rePrqNwng>

### Need for Subsidy

All applicants for Community Action’s PSH programs must show that they need the subsidy.

• The unit to be subsidized must be the household’s only residence

• If the calculated total tenant payment exceeds the gross rent, the household may not be considered eligible even if the annual income is below the applicable income limit.

Chronic Homelessness Documentation  
For chronic homelessness documentation, 3rd party verification if preferred. However, up to 3 months can be documented through self-certification. The Case Manager must show a written record of their due diligence to obtain 3rd party verification of the families’ chronic homelessness.

A single encounter in a month is sufficient to consider the household homeless for the entire month, unless there is evidence of a break.

Break Definition & Documentation  
A break is defined as at least seven nights not residing in an emergency shelter, safe haven, or place not meant for habitation. Evidence of a break can either be documented by third party evidence or by a self-report of the individual.

### Institutional Stays Definition & Documentation

An institutional stay includes residing in jail, substance abuse or mental health treatment facility, hospital, or other similar facility. To document these institutional stays, obtain discharge paperwork or written/oral referral from a social worker, case manager, or other appropriate official stating the beginning and end dates of the time residing in the institutional care facility. Where these are not attainable, a written record must be made showing the Case Manager’s due diligence to obtain 3rd party verification and the individual’s self-certification that s/he is exiting an institutional care facility where s/he resided less than 90 days.

Disability Documentation  
Disability must be documented by written 3rd party evidence from a professional licensed by the state to diagnose and treat the disability and certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual’s ability to live independently. This could include: written verification from the Social Security Administration, the receipt of a disability check, or by completion of the Verification of Disability form. In extremely limited cases where the disability is apparent, the Case Manager may document their observation of the disability. However, you must obtain written, 3rd party evidence within 45 days.

Program Assessment  
The Community Action’s PSH programs Case Manager will complete the Region 16 Coordinated Assessment documents or obtain them from the referring provider. If the applicant is coming from emergency shelter, the shelter serves as the access point. If the individual is on the street, the PSH Case Manager can be the access point. Individuals must go through the coordinated entry process to be taken into the program and cannot enter through a side door. This means the individuals placed must be on the PSH prioritization list in HMIS and have a completed VI-SPDAT. Individuals are taken into the program based upon the decision made by the PSH Prioritization Committee for the prior month. The most recent assessment is available on the HCRP website at [Region 16 Homeless Housing Programs | Community Action Commission of Fayette County (cacfayettecounty.org)](https://www.cacfayettecounty.org/region-16-homeless-housing-programs/). The following documents are required at the time of the most recent update to this policy:

Diversion Assessment – this form is generally filled out by an Emergency Shelter provider or the access point. The Case Manager should request the Diversion Assessment when receiving the referral from Emergency Shelter. In the case that the individual is coming from the streets, the Community Action’s PSH programs Case Manager will complete the form, as she is an access point.

Universal Release Form – this form should be completed by the Case Manager at intake. The release should last for one year and participants must be informed that they may revoke their consent at any time.

HMIS Data Privacy & Consent Form – this form should be completed by the Case Manager at intake and authorizes the Case Manager to collect their information for the purposes of HMIS.

Housing Status Documentation Form – this form is utilized to document the applicants’ current housing status and be accompanied by the appropriate 3rd party documentation. Community Action’s PSH programs participants must be within the first three living situations on the form. These include: living on the street or sleeping in a place not meant for habitation, living in shelter designed to provide temporary living arrangements, and exiting an institution where they resided for 90 days or less.

Third Party Verification of Income – this form should be used when the participant does not already have acceptable proof of income, such as paystubs, SSI/SSDI award letter, etc. Should the participant have these items, they should be placed in the file behind the self-declaration of income Form. The Case Manager should send the third-party verification of income form directly to the employer or appropriate office once they have obtained a signature from the applicant for the source to release the information. This form should not be given to the applicant to hand deliver.

Self-Declaration of Income – this form should be used in rare cases where the Case Manager is unable to obtain 3rd party documentation or when the applicant has no income. There may also be cases where the applicant might recycle or scrap metal for income. The use of this form would be appropriate then as well.

Verification of Chronic Homelessness – this group of forms should be used for every entry. These include: Current Housing Status Documentation, Chronical Homeless Documentation, Disability Status. These forms, while a part of CE, are placed into Tab 2, for convenience purposes.

VI-SPDAT – the Vulnerability Index and Service Prioritization Tool will be utilized to determine participant need and prioritization for services. There are three tools available and they should be utilized appropriately. Individuals ages 18-24 will complete the TAY-VI-SPDAT. Individuals over 24 will complete either the individual or family SPDAT, as appropriate.

Identity Documentation  
During assessment, the Community Action’s PSH programs Case Manager should collect copies of driver’s licenses, state identifications, birth certificates, and social security cards for all members of the household. Should an individual not have these documents, the Case Manager should continue the assessment and enrollment process and work with the participant through referrals and assistance to obtain these documents for the participant and the participant’s file.

# Program Intake

At program intake, the Case Manager will review all program assessment materials and verify the client is next up on the PSH prioritization list. The assessment includes all program eligibility criteria. The Case Manager will then refer to the HCRP website at [Region 16 Homeless Housing Programs | Community Action Commission of Fayette County (cacfayettecounty.org)](https://www.cacfayettecounty.org/region-16-homeless-housing-programs/) to obtain the most recent HCRP intake, which is located in Enrollment tab of the PSH file.

Region 16 CSBG – As a recipient of CSBG funding, all staff must complete this form at intake.

Consent to Service & Participant Agreement – During enrollment into the program staff must carefully cover program criteria and obtain the consent to services, both housed on this form.

Strengths and Challenges Assessment – Case Managers must use this form to provide strengths-based case management with program participants. Challenges should be used to identify ways in which you can overcome them to achieve housing stability.

Self Sufficiency Action Plan – Case Managers must use this form to set housing focused assistance as it relates to maintaining housing, increasing income and increasing benefits.

Staff Certification of Eligibility – Case Managers must use this form, which is signed off on by their supervisor, that the household was eligible, taken through the CE process, and next up on the prioritization list.

Housing Search Case Plan – Case Managers must use this form to delineate responsibilities for housing placement. If no progress is made in two weeks, the Case Manager should meet again with the participant and increase intensity of the services being provided.

Services Provided/Referred – Case Managers use this form to document early referrals. Additional updates will be in the file at other locations.

Confidentiality Agreement – Case Managers must use this form to go over when confidentiality applies and what cases it may not to encourage a positive relationship with the client.

JFS Fax – this form is intended to collect income and benefit information from the Department of Job and Family Services. This form should be faxed by the Case Manager directly to Job and Family Services.

Asset Verification Form – this form should be completed on each applicant and any proof of assets should immediately follow the form. For a more detailed explanation of what the Community Action’s PSH programs program considers an asset, please reference the asset definition section of this manual.

Approval/Denial Letters – Once assessment is complete, the Case Manager must send the applicant and referring agency an approval or denial letter. The denial letter must indicate the reason for denial, include a listing of needed documentation if that is the reason, and include the contact information and process for an appeal of the decision.

Medical Expense Forms – the file should contain the following 3 forms if the applicant has medical expenses that are not covered by insurance that they pay for out of their own income. These expenses will be deducted from their share of the rent. These forms include: the Medical Expense, Medical Deduction Worksheet, and Verification of Medical Expenses forms. These forms are not used very often and therefore do not have to be included in each file, but should be used when clients have unreimbursed medical expenses.

The PSH Case Manager must immediately accept the referral and enter the client into HMIS. The household will be logged on the Enrolled excel file to ensure entry into HMIS and inclusion on the monthly report. If the client has any missing assessment information, steps must be taken and documented to obtain missing program forms. If identify documentation is missing, staff must work with flexible funding sources to obtain these for the client.

Housing Placement & Inspection  
Housing Placement  
Individuals and families seeking assistance with Community Action’s PSH programs generally are households that have the highest barriers to housing, which will include criminal histories, poor credit, multiple past evictions, etc. As such, the Community Action’s PSH programs Case Manager should expect to assist participants in housing search and placement, should those services be desired. Every individual being deemed eligible for Community Action’s PSH programs should at a minimum be offered the CACFC housing provider list. The Case Manager, utilizing information collected at intake, should review CACFC’s housing provider list with the participant and identify housing that will not be suitable due to the housing provider’s (legal) screen-out criteria. This will help your participant more effectively utilize their time in locating a unit. CACFC staff must review the fair housing section to familiarize themselves with fair housing policy and how to report fair housing violations.

If desired by the participant, the Case Manager may also: search the internet and Facebook sites for available units, review the local paper, and utilize informal networks, such as word of mouth to identify open housing units in the community. Program staff should actively network with local housing providers and invite them to attend the monthly Continuum of Care meetings at least annually.

CAC homeless program staff, including permanent supportive housing, must continually work on landlord recruitment and actively update the available housing list. The Landlord Benefits Form, available on the homeless crisis response program website, outlines the benefits of working with Community Action programs. Efforts must be made to engage landlords to participate in monthly continuum of care meetings.

The available housing list must include a wide array of housing options. This must include subsidized housing, income based housing and private housing. Referrals should be made to the Metropolitan Housing Authority when household’s income qualify and the list is open.

CAC staff may not have a policy of “not advocating” for homeless participants. The amount of assistance must be tailored to the client’s needs. A poor rental history, past drug use or other housing barriers are not acceptable reasons for not assisting these households with placement services. When needed, staff should practices discussing housing barriers and poor rental histories with the client so they may advocate for themselves. When the household is not capable of this on their own, due to ability or disability, staff should intensify services to help the client find housing as rapidly as possible.

Fair Housing & Special Outreach  
An individual and/or family cannot be discriminated against based on race, color, national origin, religion, sex, gender identify, sexual orientation, or familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For a full listing of laws and executive orders relating to fair housing, please visits <https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws>.

If an individual and/or family faces discrimination in housing, the Case Manager must refer and/or assist the customer in contacting the local fair housing office, the Fayette Metropolitan Housing Authority or to the Department of Housing and Urban Development.

Fayette Metropolitan Housing – call 740-335-7525.

Department of Housing & Urban Development – Online: <https://portal.hud.gov/FHEO903/Form903/Form903Start.action> or call (800) 765-9372.

### Unit Size

The following factors will be considered in determining the unit size:

• Number of persons

• Relationship of persons

• Gender and age of persons

• Need to avoid overcrowding, maximize the use of space, and minimize the subsidy costs

Generally, no more than two persons are required to occupy a bedroom. Children may share a bedroom with a parent, if the parent so wishes. This decision is made by the parent. All children expected to reside in the unit must be counted (e.g. unborn children, children in the process of being adopted, children who are subject to a joint custody agreement and live in the unit at least 50% of the time). A copy of the custody agreement or other equivalent document must be retained in the tenant file.

Live-in attendants, foster children, and children who are temporarily absent due to placement in a foster home are also counted when determining unit size. Children who are away at school, who live with the family when school recesses, may be counted. Adult children on active military duty and permanently institutionalized family members are not included in the bedroom count

The maximum number of bedrooms allowed is:

• 1BR for head of family/spouse/partner

• 1BR for every two children of the same gender (not including adult children of the family)

• 1BR for an only child

• 1BR for multi-generation member or other adult not covered in above bullets

• 1BR for approved live-in aides

A participant may request to be assigned a larger unit as a reasonable accommodation. Such requests must be made to the CACFC and approved or disapproved in writing by the Case Manager. In all cases, local, state, or federal rules, regulations, or ordinance will take precedence over the above stated policies should a conflict arise.

Program staff must make ongoing efforts to conduct special outreach to the aforementioned populations using the following tactics.

* Placing program materials through mass media sources like radio, television, and the local paper.
* Placing program flyers at local laundry mats, elderly and disabled properties, grocery stores, the library and other locations.
* Distributing information to the ministerial association and to local pastors.
* Conducting specific outreach to other areas that these special populations may congregate or attend.

## Housing Location Time Limits and Extensions

Due to the many barriers chronically homeless individuals face in locating housing the Case Manager must begin working with the household quickly to obtain housing and continue working with them until they are placed. However, this policy must be balanced with state and federal performance measures. Case Managers should explain to the participant that that they have a maximum of 30 days from program acceptance to obtain a unit. Based up extenuating circumstances, such as illness, difficulty finding a landlord to accept them, or other barriers that can be expected when serving this high needs population, Case Managers may grant a 30 day extension. Should the participant find permanent housing living with friends or family in the interim, that individual would no longer qualify as homeless and would no longer be eligible for assistance. This should also be explained to the participant up front. Individuals whose homelessness continues beyond 60 days without locating a unit, in spite of the case manager’s documented efforts or due to nonresponse, should continue to remain next on the list, but another homeless household should be served rather than holding up the voucher any longer.

## Household Definition & Unit Selection

A ‘household’ is all persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements. In calculating annual household income, income from each member of the household is to be considered. Community Action’s PSH programs applicants must identify on their initial program application all persons expected to reside in the household.

Upon entry into the Community Action’s PSH programs program, all persons expected to reside in the household will be confirmed by the CACFC and their information will be documented through the completion of program intake and assessment forms.

Any changes in household composition must be reported by the tenant to the CACFC within 10 days of such change. The additions or subtraction of household members may affect the unit’s income level and eligible unit size, therefore a new rental calculation form must be completed.

### Live-in Aides

A live-in aide is a person who resides with an elderly, handicapped or disabled person who:

• Is determined essential to the care and well-being of the person and;

• Is not obligated for the financial support of the person and;

• Would not be living in the unit except to provide the necessary supportive services.

The household must provide a licensed professional’s certificate that the live-in aide is essential to the care or well-being of the tenant. A relative may be a live-in aide but must meet all of the requirements listed above. A live-in aide qualifies for occupancy only so long as the individual needs support services and may not qualify for continued occupancy as a remaining household member. The income of a live-in aide is not counted as a part of the household income.

## Rent Amount

Community Action’s PSH programs will allow rents (including utilities) of the lesser amount of either up to 100% of applicable Fair Market Rent (FMR) or the rent shown to be ‘reasonable’ for the area in which the housing is located.

All rental units subsidized by Community Action’s PSH programs must pass the ‘Rent Reasonable’ test regardless of if they fall within the current FMR. Community Action’s PSH programs funding is based on the FMRs as established by HUD and which are updated on an annual basis. Fair Market Rent schedules are published by HUD and are widely available from your local Public Housing Authority. To access the latest annual Fair Market Rents, please visit: <https://www.huduser.gov/portal/datasets/fmr.html>.

CACFC staff is expected to be aggressive in negotiating the best rent. Securing the lowest possible rents will result in savings for the program and thus allow more people to be served by Community Action’s PSH programs.

Rent Reasonableness Documentation  
Rents for units leased with Community Action’s PSH programs assistance must meet a "rent reasonableness" test. This section describes this standard for rents and how a reasonable rent is documented. Even though rent reasonableness must be shown for each unit, the actual rent and utilities amount must fall within 100% of FMR for the area where the unit located.

Community Action’s PSH programs staff must determine whether the rent being charged for an assisted unit is both:

• Reasonable in relation to rents being charged for comparable unassisted units with similar features and amenities; and

• Not more than rents currently being charged by the same owner for comparable unassisted units. [See Section 582.305(b)]

The Rent Reasonableness Worksheet must be completed and placed in the client’s file (Tab 3 – Housing Inspection) for each unit at time of rent-up and whenever the rent changes. This documentation must be kept in project files for the full period Community Action’s PSH programs assistance is provided.

The grant amounts are calculated by multiplying the number of units to be assisted by the FMR, not the "reasonable rent;" therefore, units may not be subsidized at the rent reasonable level without prior written approval. Approval will be based on the quality of the unit, the availability of other suitable units, and the ability of the grant to absorb the extra costs. Even with the approval, the rent for a Community Action’s PSH programs assisted unit may not exceed the reasonable rent or FMR for Fayette County.

## Utility Payments

CACFC staff is encouraged to work with landlords to include the utilities in the rental amount. If a landlord is willing to include the utilities in the rental amount, the Maximum Utility Payment is $0. If, a landlord is not willing to do so, a Maximum Utility Payment can be included in the rental calculations when determining Tenant Rent and Assistance Payment, so long as they do not exceed FMR.

CACFC will assume responsibility for the payment of the utility to the respective utility company in a partnership with the program participants. Program participants must bring their utility bill to their Case Manager in a timely fashion. Ideally, this would be within 3 days of receipt. Program participants should be encouraged to apply for the Percentage of Income Payment Program with CACFC’s staff. In cases where the participant has income, their income should be calculated to go towards the payment of their utilities first and then their portion of the rent.

CACFC staff will use the Rent Calculation Worksheet to determine the amount of utilities that will be covered by the program.

Note: The gross rent (rent plus utility allowance) must fall with the ‘rent reasonable’ range for the unit size and location, provided that the unit rent is comparable to area rents.

## Housing Quality Standards

The U.S. Department of Housing and Urban Development (HUD) has developed Housing Quality Standards (HQS) that define the minimum health and safety regulations that must be met in order to pass inspection.

### Initial Inspection

An Inspection must be conducted by an HQS trained inspector or co-signed by an HQS trained inspector prior to a lease being executed and the tenant moving into a unit. Assistance will not be provided for units that fail to meet the HQS. All initial inspections should be done with the landlord or management agent present. The HQS long form 52580-A must be utilized on initial inspections. The CACFC contracts with the Fayette Metropolitan Housing Authority to provide these inspections. If there are deficiencies, the Housing Authority must give the landlord an appropriate amount of time to correct deficiencies (not to exceed 30 days) and communicate that time period with the Case Manager. Depending on the amount of time it may take for deficiencies to be corrected, Community Action’s PSH programs staff will inform the participant and give them the option to locate more suitable housing or wait for the deficiencies to be addressed.

### Annual Inspections

Inspections must occur at least annually for all Community Action’s PSH programs subsidized units. Assistance will not be provided for units that fail to meet the HQS standards unless the owner corrects any deficiencies within 30 days from the date of the inspection and staff verifies that all deficiencies have been corrected.

If the unit fails the annual inspection landlord or tenant will be given 30 days to correct the deficiencies. Landlord, tenant and service providers will be given written notification of deficiencies and a re-inspection must be scheduled prior to the 30th day to check for compliance. If repairs have not been made HAP must be withheld from the landlord. If repairs have not been made by the 60th day following the inspection then the Case Manager should assist the tenant with finding another unit which meets HQS standards.

If there is an immediate health and safety violation the CACFC may withhold rent prior to the 30 day deadline.

HQS Inspection & Lead Paint  
The Lead-Based Paint section of the HQS applies only to dwelling units occupied or to be occupied by families or households that have one or more children of less than 6 years of age, common areas servicing such dwelling units, and exterior painted surfaces associated with such dwelling units or common areas. Common areas servicing a dwelling unit include those areas through which residents pass to gain access to the unit and other areas frequented by resident children of less than 6 years of age, including on-site play areas and child care facilities. (24 CFR 35.1200)

All units as described above will be inspected for Lead-Based paint deterioration as defined in HQS form 52580-A. Procedures as written in section 1.9 of HQS form 52580-A will be followed for needed corrections.

Deteriorated paint includes any painted surface that is peeling, chipping, chalking, cracking, damaged or otherwise separated from the substrate.

Please refer to 24 CFR 35.1200 and the “Interpretive Guidance, The HUD Regulation on Controlling Lead-Based Paint Hazards in Housing Receiving Federal Assistance and Federally owned housing being sold (24 CFR Part 35)” if further information is needed.

If the dwelling unit occupied or to be occupied by families or households will have or expect to have one or more children of less than 6 years of age:

• Inform the head(s) of household about lead hazards often present in housing in the State of Ohio.

• Provide the subsidy recipient with “Protect Your Family from Lead In Your Home”

• Advise family to look for housing in buildings built after 1978 or housing that has been recently rehabilitated.

• Advise family to look for housing that is free from peeling, chipped paint not only inside the unit, but also in building common areas and outside where children will play.

• Pay particular attention when conducting initial and also annual HQS inspections in units that will be (or are) occupied by households with children ages six and under. CACFC staff performing the HQS inspection must evaluate not only the interior of the unit, but also the exterior and common areas of the building, especially areas where children may play.

• Obtain copy of signed “Lead Disclosure Statement” from the Landlord to keep in the tenant file, both initially and at the annual re-certification. In accordance with Ohio State Law, Landlords are required to provide tenants with the brochure “Protect your Family from Lead in Your Home” and have them sign a lead disclosure statement.

## Lead Paint

Households whose potential unit triggers a lead-based inspection, regardless of composition, will be given the brochure “Protect Your Family from Lead in the Home” and be provided with the form “Disclosure on Lead-Based Paint” to complete with their landlord if the landlord has not already provided such form.

#### Staff Training

The following information must be reviewed whenever a new CACFC staff is hired and/or whenever households with children ages six and under enter the Community Action’s PSH programs program.

• Lead hazards are found not only in peeling paint but also in dust from window sashes and around door jambs, plumbing fixtures, water flowing from lead pipes, marine painted surfaces, costume jewelry, pottery, and in residue on shoes or clothing of people who work with car radiators and batteries (see brochures).

• Lead dust, often found in window sashes, can be a greater hazard than peeling paint.

• Children in Ohio households who are members of a “high risk population group” i.e., those that receive OhioCare, TANF, Head Start and/or WIC, receive routine screenings at 12 and 24 months. If not previously screened, children ages 36 to 72 months that are in a high-risk group will also be screened (see brochures provided by the Ohio Childhood Lead Poisoning Prevention Program).

Lead Poisoning Protocol  
If CACFC/Fayette Metropolitan Housing staff fails to identify the presence of lead hazards in an HQS inspection, and a child living in the unit becomes lead poisoned, the CACFC program is responsible for passing a unit that does not meet HQS standards. As soon as a lead hazard is identified (at any point in the household’s tenancy) the CACFC must ask the landlord to remedy the hazard within 30 days. If a reasonable effort is being made to remedy the hazard but it takes more than 30 days, the CACFC has the discretion to stop the HAP until the unit meets HQS.

The Ohio Childhood Lead Poisoning Prevention Program receives the results of all blood lead screenings for children in the State of Ohio. They will intervene when a child's lead level is elevated. For more information on the program, please visit: <https://www.odh.ohio.gov/odhprograms/eh/lead_ch/leadch1.aspx>

Blood lead levels below 10 ug/dl no intervention is required; Blood lead levels 10-14 ug/dl the Ohio Childhood Lead Poisoning Prevention Program (MCLPPP) will mail educational materials to the parents; Blood lead levels 15-19 ug/dl the Main CLPPP will refer the family to a Public Health Nurse for a home visit; Blood lead levels above 20 ug/dl; and Blood lead levels above 45 ug/dl require hospitalization.

* Primary healthcare provider should conduct medical, developmental and nutritional assessment.
* LPPP will conduct an environmental investigation in the home and refer to the Public Health Nurse for a home visit. The environmental investigation could result in an order to abate. If that happens, the building will be posted and identified as an environmental hazard. The landlord will be required to fix the hazard and comply with the abatement order.
* LPPP will refer the child for a comprehensive developmental evaluation.
* Lead Chelation Therapy is indicated.
* Call LPPP for appropriate treatment guidelines and referral to Lead Poisoning Medical Consultant if needed.
* LPPP interventions and referrals as stated above.

HUD has an extensive website with the history and regulations surrounding lead based paint. Please see website below, <http://www.hud.gov/offices/lead/>.

All PSH Program participants with units constructed prior to 1978 must receive a lead brochure, which is available on the HCRP website.

Tenant Rent Calculation  
Case Management staff, utilizing information collected during the assessment and verification phase, should complete the Tenant Rent Calculation Worksheet once the unit has passed all applicable inspections.

### Expense Allowances & Calculations

#### Disability Allowances

Every Community Action’s PSH programs household receives one disability allowance of $400 annually.

#### Dependent Allowance

$480 is allowed for each household member for each household member who is 17 years or younger, disabled, or is a full-time student. The head spouse, foster child, adult live-in attendant, unborn child or child that has not joined the family are never counted as dependents.

A full-time student is defined as an individual carrying a full-time course load and is enrolled in a certificate or degree program at an institution.

#### Child Care & Support Expenses

* Anticipated expenses for care of children 12 and younger may be deducted if:
* Care is necessary to allow a family member to go to work or school,
* No adult household member capable of providing care is available,
* Expenses are not paid to a family member living in the unit,
* The expense is not reimbursed by an agency or individual outside the household, and

Amount deducted reflects reasonable child care expenses and does not exceed the amount earned by a working family member.

Child care allowances attributable to the work of a full-time student (except for the head spouses and co-head) is limited to $480 since the employment income of full-time students in excess of $480 is not counted in the annual income.

Child support payments to guardians or estranged partners or child care payments on behalf of a minor who is not living in the applicant household cannot be deducted.

#### Medical Expenses

Community Action’s PSH programs participants are eligible for a medical expense deduction due to their disabled status. The medical expenses of all family members are counted. Medical expenses include all expenses anticipated to be incurred during the 12 months following certification /re-certification, which are not covered by an outside source, such as insurance.

They may include:

• Services or doctors and health care professionals

• Services of healthcare facilities

• Medical insurance premiums or cost of an HMO

• Prescription or non-prescription medicines

• Transportation to treatment

• Dental expenses

• Eyeglasses, contact lenses, hearing aids and batteries

• Live-in or periodic medical assistance such as nursing services, assisted animal and its upkeep

• Monthly payment on accumulated medical bills

• Medical care or a permanently institutionalized family member only if his or her income is include in the annual income

• Long-term care insurance premiums

Anticipated medical expenses may be based on the medical expenses the family paid in the 12 months preceding the certification less any one time non-recurring expenses. The allowable medical expense deduction is that portion of the total medical expenses in excess of 3% of the total gross annual income.

#### Allowance for Disabled Household Member

CACFC may deduct anticipated cost for attendant care and/or auxiliary apparatus for disabled family members that exceed 3% of annual income if such expenses:

* Enables one or more family members to work
* Are not reimbursed by an agency or individual outside the household
* Are not paid to a family member living in the unit and
* Does not exceed the earned income of the household member enabled to work.

**Attendant care includes**: homecare, housekeeping and errand services, interpreter service, etc.

**Auxiliary apparatus includes**: wheelchairs, ramps, adaptation to vehicles, special equipment, etc. if directly related to allowing the disabled person or other family member to work.

### Rental Calculations & Documentation

The Rent Calculation Worksheet is used to determine the Household Rent and the Community Action’s PSH programs Assistance. Household Rent is calculated at thirty percent (30%) of a tenant’s adjusted gross income. All income, assets, deductions, and allowances must be verified in the verifications tab of the client file.

Rent Calculation Worksheets are to be completed by the CACFC when an application has been accepted and before the household moves into an apartment. Rent Calculation Worksheets are also completed if the household has a change of income, utility amount, moves into a different apartment, at annual certification, or the contract rent for the apartment changes.

Lease  
The lease (and sublease) is a specific agreement that is made between the landlord/property manager, program participant, and/or the CACFC case manager. In projects that require a 3rd party lease (sublease) CACFC is the tenant and the program participant is the sub lessor. In sublease projects, CACFC must pay rent directly to the landlord/property manager based on actual costs. Note that rent paid on units cannot exceed fair market rent or rent reasonableness, whichever is less. CACFC is responsible for 100% of the rent. The program participant pays their share, based upon the Rent Calculation Worksheet to the Case Manager monthly. A copy of the lease (and sublease) must be maintained in the client file in the Housing tab and updated annually. For PSH projects with a lease between landlord/property manager and program participant only, the program participant pays their share, based upon the Rent Calculation Worksheet directly to their landlord/property manager monthly. No provisions can be included requiring the participant to engage in services.

Program Enrollment & Services  
Once tabs 1- 3 and the aforementioned steps outlined in this policy manual have been completed, the Community Action’s PSH programs Case Manager will complete the participant’s enrollment into the Community Action’s PSH programs program and enter the household into the Homeless Management Information System according to the BOSCOC HMIS Standards. The program entry date should be the same in the client file and HMIS and correspond to the date on their Tenant Responsibilities Agreement.

Housing Payment Requests  
The Community Action’s PSH programs Case Manager will submit the proper paperwork to the CACFC Fiscal Department as soon as the unit passes inspection, the lease is executed, and the participant is officially enrolled into the program. To process payments for the first time, the Fiscal Officer will require the following: the lease, completed W9 Form from the landlord, a purchase order, and a check request.

After the initial check request, the Case Manager should submit a report to the Fiscal Officer on the last day of the month detailing the following information: participant’s name, landlord’s name and address where the payment should be mailed, and the total rent amount.

At the beginning of each recertification period, or whenever income changes, a new purchase order must be completed. Otherwise, staff only need email the Fiscal Officer monthly. Purchase orders and emails must be sent no later than the 25th. Checks are cut on Tuesday, so if the 25th is after the preceding Friday, staff should submit the purchase order earlier to account for when checks are cut.

Utility Payment Requests  
When the participant has income, they should first contribute their income towards the cost of their utilities. When participant rent contributions do not cover the monthly cost of the utility, the following process should be followed.

* The Case Manager should teach the participant to turn in all utility bills within three days of their receipt to the Case Manager for processing.
* The Case Manager will complete a purchase order and check request for the participant’s share of the utility.
* Copies of the utility bill, purchase order request, check request, and approved purchase order should be maintained in the client file in the tab 4, financial assistance.

Case Management & Referrals  
For participants that wish to receive voluntary supportive services through the program, the Case Manager should utilize either the Initial Client Service Plan and/or Self-Sufficiency Action Plan forms, the Referral Tracking Form, and document all client interactions in Tab 6 – Service Tracking Form/Case Notes. These forms are intended to capture participant progress towards their goals, outcomes of referrals made, and other pertinent information. CAC PSH Case Management must have all of the following services and activities:

1. Services to help obtain and move into housing - Assess and understand tenant needs and housing barriers and help resolve barriers. Provide support to RRH clients as they look for housing units and assist in housing search as needed.
2. Services to help stabilize in housing - Help resolve any tenancy issues that may arise; Help clients understand their responsibilities within a lease; Connect clients to mainstream resources and employment.
3. Close out the case - Assess client need to ensure there is no longer imminent risk of homelessness; Ensure clients know they can contact RRH again if needed; Financial assistance may only be provided if client becomes homeless again (or if the case has not yet been closed).

When possible, PSH staff should provide case management services in the client’s home. At minimum, CAC PSH staff must enter the client’s home once/year. This allows case managers to see if additional life skills support may be necessary to keep the household in housing.

During the monthly visit, staff and clients must address the following:

1. The need for ongoing financial assistance and the amount to be provided
2. Review monthly income and expenses
3. Update the housing stability plan
4. Verify the household is still living in the unit
5. Identify any tenancy or late rent issues

## Housing Stability Plans

A housing stability plan establishes actions and timelines for clients to seek non-cash benefits, cash income, and connection to other mainstream resources, as determined collaboratively by the client and program staff. This includes figuring out what benefits they desire and developing a plan to get them. These resources include: food pantries and food support programs, health insurance/Medicaid, utility assistance, SSI/SSDI, child care, job training programs, clothing assistance and transportation. Referrals should also connect to community supports that assist with resume development, job search skills, and interviewing skills.

Housing stability plans will also establish actions and timelines for clients to address other housing-related goals/needs, as identified by the client. This may also include working to resolve tenancy issues, on-time rent payments, following the lease, being a good neighbor, and not causing damages to their units.

PSH Case Managers must make multiple attempts to engage PSH clients who are not making progress on Housing Stability Plans. This is accomplished through the following methods:

* During required PSH Case Management meetings, PSH program staff and clients collaboratively review progress on the Housing Stability Plan and identify any areas of the plan that need revision.
* After revisions to a Housing Stability Plan have been made, PSH program staff allow several months for clients to make progress on the revised plan.

## Tenancy Issues

Case Managers must respond to tenancy issues and mediate between the landlord and the client to retain current housing. Case Managers should use discretion and identify when retaining current housing is not an option. In these cases, staff must work with the landlord and the participant to negotiate a move out to avoid eviction.

Community Partnerships  
Case Managers are encouraged to develop and work with a network of providers, service professionals, and consumers in the maintenance and ongoing development of service partnerships. Although the CACFC is ultimately the responsible party for ensuring compliance with local, state, and federal regulations and guidelines regarding the administration of units under Community Action’s PSH programs, the tasks of a local service partnership may include:

* Providing outreach to mental health consumers to alert them to the availability of services;
* Assessing consumer needs at the local level;
* Assisting recipients in locating, securing, and establishing themselves in safe and decent housing;
* Assisting in the arrangement and the provision of community support services;
* Establishing and maintaining relations with local landlords, public housing authorities, and property managers;
* Providing other services aimed at maintaining adults with serious mental illness in mainstream housing in the community;
* Providing mainstream benefits, mental health services, substance use disorder counseling and related services, employment and disability related training and assistance;
* Connection to primary health care providers and in home care, as appropriate; and
* Proposing suggestions for modifications to procedures to increase access to housing.

## Monthly Evaluation

All Continuum of Care projects must meet with program participants at least monthly to assess their housing stability and continued need for services. The Case Manager cannot require the participant to create or achieve goals not related to their housing stability in their client service plans as a means of continued eligibility to receive services. Additionally, Community Action’s PSH programs’ primary goal is to place program participants into housing as quickly as possible, regardless of other personal issues or concerns. Therefore, any goal planning must be client directed and pertain to the participant obtaining and retaining permanent housing.

Voluntary participation in services does not mean that the client does not have to meet with the Case Manager. HUD does require monthly evaluation of participant’s needs and housing stability. Therefore, the Case Manager must meet with the participant to determine their continued need for assistance.   
  
The Case Manager should discuss whether or not the participant might wish to move into a non-PSH affordable housing unit. These discussions should be focused on the participant and their wishes. Case Management staff should take care so as not to be perceived as telling the participant they must leave the program. Some examples of participants that may not be able to move to non-PSH affordable housing unit would include participants with zero income and extensive criminal histories that would bar them from obtaining an income-based housing unit and/or individuals that cannot locate a landlord that will rent to them without CACFC’s assistance. These circumstances can be dynamic and should continue to be assessed regularly.

Monthly evaluation is the responsibility of the Case Manager, not the program participant. The Case Manager should communicate compassionately and consistently with program participants regarding the need for the Case Manager to continually monitor their housing situation and offer (but not require) supportive services.

Examples of when a client might be ready to exit PSH include: not at risk of homelessness, progress on stability plans, connections to mainstream resources, employment, and/or other supports.

## Monthly Service Meetings

The Case Manager will also hold (voluntary) monthly meetings for Community Action’s PSH programs participants with meals and guest speakers on benefits and services that would be useful for program participants. Transportation will be provided to participants to and from these monthly meetings. These meetings offer an opportunity to reduce isolation, increase socialization, and provide participants with nutrition and a sense of community.

Case Note Documentation  
Case notes should be maintained in Tab 6 of the client file. The Case Notes section of the file is important for many reasons, which include: providing background and history of participant interactions, assuring continuity of care, documentation for legal issues, evaluation of interventions and service delivery, accountability, and to meet funder requirements.

Case Managers should be concise, but informative in their documentation of client interactions. Case notes should be taken in the provided form in Word and spelling and grammar checks should be utilized prior to printing the notes and maintaining them in the case file.

When a participant identifies a need, the Case Manager should work with the participant to solve that need and document it within the case notes, and include: the date/time of the interaction, the problem to be addressed, actions for the Case Manager to take, actions for the participant to take, and the outcome from those actions on the identified need. Using a strengths-based approach, the Case Manager should help the participant identify their personal resources, skills, and abilities to overcome obstacles.

Case notes should not diagnose participants, but rather reflect statements of fact. For example, a Case Manager may not state, “The resident is clearly suffering from a mental health disorder.” Rather, it should describe the interaction. For instance, a note may state, “The resident reported being diagnosed as bipolar” or “The resident reported having very high energy at times, but told the Case Manager that they have been unable to get out of bed for three days.” Case Managers should sign and date their case notes.

Tracking Match & Community Services  
Per its contract with HUD, CACFC must maintain documentation of services received by program participants. Match is collected over the operating year of the grant and reported on the Annual Performance Report. Case Managers should check with the Housing Director to verify how much match was obligated for the performance period. To be eligible as match, the cost must be an eligible Continuum of Care cost.

Eligible Continuum of Care Supportive Services Costs   
In general. Grant funds and match may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service. Supportive services must be necessary to assist program participants obtain and maintain housing.

1. Annual Assessment of Service Needs. The costs of the assessment required by § 578.53(a)(2) are eligible costs.
2. Assistance with moving costs. Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.
3. Case management. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:
   1. Counseling;
   2. Developing, securing, and coordinating services;
   3. Using the centralized or coordinated assessment system as required under §578.23(c)(9).
   4. Obtaining federal, State, and local benefits;
   5. Monitoring and evaluating program participant progress;
   6. Providing information and referrals to other providers;
   7. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
   8. Developing an individualized housing and service plan, including planning a path to permanent housing stability.
4. Child care. The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.
   1. The children must be under the age of 13, unless they are disabled children.
   2. Disabled children must be under the age of 18.
   3. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
5. Education services. The costs of improving knowledge and basic educational skills are eligible.
   1. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
   2. Component services or activities are screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
6. Employment assistance and job training. The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.
   1. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
   2. Services that assist individuals in securing employment consist of:
   3. Employment screening, assessment, or testing;
   4. Structured job skills and job-seeking skills;
   5. Special training and tutoring, including literacy training and prevocational training;
   6. Books and instructional material;
   7. Counseling or job coaching; and (F) Referral to community resources.
7. Food. The cost of providing meals or groceries to program participants is eligible.
8. Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.
   1. Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.
   2. Mediation with property owners and landlords on behalf of eligible program participants;
   3. Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
9. Legal services. Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family‘s ability to obtain and retain housing.
   1. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.
   2. Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
   3. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient‘s employees‘ salaries and other costs necessary to perform the services.
   4. Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.
10. Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public
11. Mental health services. Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
12. Outpatient health services. Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
    1. Providing an analysis or assessment of an individual‘s health problems and the development of a treatment plan;
    2. Assisting individuals to understand their health needs;
    3. Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;
    4. Preventive medical care and health maintenance services, including in home health services and emergency medical services;
    5. Provision of appropriate medication;
    6. Providing follow-up services; and
    7. Preventive and non-cosmetic dental care.
13. Outreach services. The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.
    1. Eligible costs include the outreach worker‘s transportation costs and a cell phone to be used by the individual performing the outreach.
    2. Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing
14. Substance abuse treatment services. The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
15. Transportation. Eligible costs are:
    1. The costs of program participant‘s travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.
    2. Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;
    3. The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;
    4. The cost of gas, insurance, taxes, and maintenance for the vehicle;
    5. The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and
    6. If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
       1. Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
       2. Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and
       3. The recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
16. Utility deposits. This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.
17. Direct provision of services. If the a service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:
    1. The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and
    2. The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

Ineligible Supportive Services Costs  
Any cost that is not described as an eligible cost under the previous section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

## Eligible Continuum of Care Operating Costs

Grant funds and match may be used to pay the costs of the day-to-day operation of permanent housing

1. The maintenance and repair of housing;
2. Property taxes and insurance;
3. Electricity, gas, and water;
4. Furniture; and

### Ineligible Operating Costs

Program funds may not be used for the maintenance and repair of housing where the costs of maintaining and repairing the housing are included in the lease.

## Difference Between Cash & In-kind Match

### Cash Contributions

Cash match and leverage is money that flows through the CACFC. It is important to note that some Federal sources of funding outside of HUD do not allow their funds to be used as **match**; Case Managers should check with the Housing Director to confirm with each source of funding whether the use of such funding for match purposes is permitted. CoC Programs funds cannot be used to match other CoC funded projects. The Fiscal Officer will pull the required

### In-kind Contributions

The CACFC may also use the value of real property, equipment, goods, or services contributed to the project as match and leverage. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the organization. If CACFC does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

## Match Documentation Process

The Case Manager will work with a variety of community partners to document match and should not consider the following processes to include a process for every type of in-kind match available, but as a guide for those used most frequently.

### Job & Family Services

The Community Action Commission of Fayette County and the Fayette County Department of Job & Family Services and Scioto Paint Valley will work together to show that local leveraged funds for OWF, State Disability, Medicaid, Food Stamps, and other services like case management or counseling. This information will be collected annually at the end of the program operating year. The end of the operating years is as follows:

Transitional Housing (10/31), Permanent Supportive Housing (4/30), Shelter Plus Care (12/31)

(These dates may be subject to change based on when funds were actually drawn down)

Steps:

1. CAC staff will obtain a release of information upon entry into the program. These releases must be updated annually.
2. CAC staff will submit a request to DJFS staff as soon as the program operating year ends. The request will include a document with client’s names and social security numbers. This information should be faxed, not emailed to protect client confidentiality.
3. DJFS staff will access their database to create a print out.
4. CAC staff will collect and maintain all leverage information in the client file. Once the client has been exited from the program and all leverage has been documented the on the Supportive Services Tracking Form with the total dollars leveraged for that household to be submitted to the Housing Director or organizational contact for input into the Annual Performance Report. All leverage must be turned in no later than 60 days after the end of the program operating year.

Contact person at JFS for OWF, State Disability Medicaid, and Food Stamps: Faye Williamson willif01@odjfs.state.oh.us

The contact person at JFS for Childcare: Veda Schafer schafv@odjfs.state.oh.us

Contact person at JFS for State Disability: Karen Huffman huffmk@odjfs.state.oh.us

Contact person at JFS for CLRC (running comments from CRISE) Faye Williamson willif01@odjfs.state.oh.us

Medicaid/Health Insurance will be collected annually at the end of the program operating year. The end of the operating years is as follows:

Contact person at Scioto Paint Valley Mental Health: [wshowman@pvadamh.org](mailto:wshowman@pvadamh.org).

# Workflow

1. CACFC receives a Community Action’s PSH programs referral and completed intake forms from the applicant, staff, or local service partnership, verifies income and eligibility requirements, and approves or denies the application in writing. The applicant will be given a maximum of 60 days to identify a unit.
2. CACFC verifies all of the information provided and documents them in the verification tab of the participant file;
3. If applicable, CACFC receives written extension request from service provider or applicant and may grant up to one 30 day extension. No applicant may be given more than 60 days to find suitable housing. Applicants who have not initiated subsidy within 60 days of program acceptance will remain on the waitlist and be eligible for the next open unit.
4. CACFC completes initial Housing Quality Standards (HQS) inspections on units located by recipients, informs the landlord and/or property manager of any deficiencies and/or needed repairs, and establishes a timeline for completion of repairs and/or deficiencies. See Sample Letter in Appendices.
5. All households must receive a lead paint pamphlet, Protect Your Family from Lead in Your Home published jointly by the United States Environmental Protection Agency, Consumer Product Safety Commission, and HUD.
6. All households are encouraged to sign a lead paint disclosure form with their respective landlord, not the CACFC.
7. CACFC negotiates unit price that meets HUD’s ‘rent reasonableness’ test and FMR standards with landlord and/or property manager, if applicable.
8. CACFC conducts initial certification with recipient and completes the enrollment form.
9. Rental Calculation Form completed and;
10. Housing Quality Standard form, Rent Reasonableness Standard form completed and signed and;
11. Tenant Responsibility Form signed and attachments distributed and;
12. CACFC executes Housing Assistance Payments Contract with the landlord/property manager and;
13. All Community Action’s PSH programs recipients enter into a Lease or Rental Agreement with their landlord. Participants are not required to enter a long-term lease but must sign an initial occupancy agreement for a term of at least one month. This agreement is automatically renewable upon expiration, except on prior notice by either the tenant or landlord and;
14. CACFC prepares the Purchase Order and Check Request Form to request funds.
15. CACFC disburses monthly HAP to landlords/property managers in accordance with HAP Contracts and;
16. CACFC completes annual re-certification and;
17. CACFC processes move-out inspections, as applicable; and
18. CACFC processes Transfers and;
19. CACFC processes Termination of Subsidy Forms and letters, as applicable, to include a copy of the Subsidy Appeals Procedure. (See Destination HOME Subsidy Termination and Appendix 8 Termination Notice Appeals Procedure) and;
20. CACFC assures staff members receive HQS and other HUD certified relevant training and;
21. CACFC establishes and maintains relations with local landlords, property managers, shelters, General Assistance Offices, Social Service Providers, and Public Housing Authorities and;
22. CACFC provides a written response and provide a written copy of the Housing Appeals Procedure to any past, present, or pending applicant or tenant for any service requested in writing, that it may turn down, reject, refuse, or deny in the administration of Community Action’s PSH programs and;
23. CACFC maintains complete Community Action’s PSH programs files on all recipients. Denied or closed files must be retained for the greater of 8 years or the time frame put forth in the CACFC agency file destruction policy. If any litigation, claim, or audit is started before the expiration period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

# Vacancy Policy

If a participant in the program vacates a unit for more than 30 days for any reason without giving a 30-day written notice to both the CACFC and the landlord the assistance payment for the unit may continue for a maximum of 30-days from the end of the month in which the unit was vacated. If the tenant returns to their unit before the last day of the assistance payment Community Action’s PSH programs will continue to provide the subsidy.

“Vacate” means to be absent from the unit (i.e. visiting family, vacationing, jail time, etc). The term vacate does not include brief periods of inpatient care. The assistance payments for individuals receiving inpatient care may continue for a period not to exceed 90 days per occurrence. The assistance payments for individuals who are incarcerated may continue for a period not to exceed 60 days.

# Moving

In accordance with the Lease, a participant may move from a current unit to another unit only if a 30-day written notice has been submitted by the first day of the month previous to the move to both the CACFC and the landlord.

If a participant leaves a unit at the conclusion of a 30-day notice and wishes to continue to receive assistance the participant must keep the CACFC informed of such plans. If the participant does not locate another unit within 30-days and does not maintain contact with the CACFC representative, the tenant will be terminated from the program.

# Abandonment

A unit will be considered abandoned if the CACFC is unable to verify occupancy by a participant after a good faith effort has been made to locate the participant. All efforts to locate the participant must be documented in the participant’s file.

# Case Closeout, Eviction & Termination of Assistance

Successful PSH case closeout involves ending rental assistance and services after PSH staff and the client have determined that the client is no longer at imminent risk of homelessness, as evidenced by some connection to mainstream resources, employment, and/or other supports. Planning for case closeout should begin within one year of program entry so that staff and clients have sufficient time to prepare closeout and to ensure the eventuality of case closeout is clearly communicated to clients.

Positive ExitsPSH staff may close out the case at any time if the household is no longer at risk of homelessness and/or when the household indicates they are no longer in need of PSH services. Determining whether or not a household is still at imminent risk is a multi-step process. Case Managers should consider the following:

* Progress on Housing Stability Plan
* RRH client has gained or increased employment or cash income
* RRH client has gained or increased non-cash benefits or other mainstream resources
* RRH client has gained or accessed other supports, such as connecting with family support systems, for example
* Ratio of income to rent/living costs
* Housing in good standing (client is able to pay rent and follow lease conditions)

## Non-Responsive Exits

There may be times when a client is nonresponsive, and it is necessary to exit them from the program. Program staff must make every effort to re-engage the client, even if it is just to exit them from the program. Reasons a client may become non-responsive could include incarceration, going to treatment, their work schedule, personal problems, being unable to pay their phone bill, or a problem with the program or the rules.

Staff must follow the termination policy and this protocol before exiting a nonresponsive participant:

* Make at least three attempts to contact the client by phone, mail, email, and/or home visit. You must use three different methods.
* Where there is a release, contact other organizations working with the client to see if they have information about the client’s whereabouts (only if appropriate and necessary).
* The very last effort prior to exiting a client (and when there is a release in place) would be to contact the landlord. This should be done with care and Case Managers must be careful to follow our confidentiality policy. This should only happen when the next effort will be closing out the case.

If there is no contact for 60 days of multiple varied methods of attempts to reach the client, PSH staff exit the client from the program. Staff must send written communication of program termination to the client explaining the reason for and date of termination. The date of termination must be 33 days after the date of the termination letter. (The letter must be mailed the date it was written, or termination should account for the time it spent not in transit. Case Managers should send a letter to the landlord the same day with communication of the likely program termination and termination of financial assistance.

If the household contacts the PSH Case Manager project after the termination date and is still experiencing homelessness, staff must connect them with local homeless resources so they can be re-assessed and screened for eligibility and prioritization

Future homeless assistance cannot be denied based upon their non-responsiveness. Staff must take great care to explain this throughout the program. PSH clients generally will lose their chronic homeless status as a result of program participation.

## Negative Exits (Termination of Assistance)

If a tenant is repeatedly given notices from the landlord or Community Action’s PSH programs staff for not paying their rent, damaging the unit, harassing other tenants, criminal activities, or continuing to break the lease despite prior warnings the tenant may be terminated from Community Action’s PSH programs. It is expected that eviction and termination of assistance will be rare and that Case Managers will make multiple, documented attempts to bring the individual into compliance with their lease. Community Action’s PSH programs participants often face multiple barriers to housing and this program is intended to assist the hard to serve. Program regulations recommend that the CACFC exercise judgment and take into consideration extenuating circumstances so that participants are only terminated for the most serious rule violations. Case Managers must discuss exits with their supervisor before beginning termination processes.

This does not mean that participants are allowed to break the law or their lease without consequences, but rather that issues will be handled on a case-by-case basis and that multiple attempts will be made, in writing, to assist the participant in coming into compliance with their lease. Under no circumstances should substance use alone be a reason for termination of assistance. Furthermore, participation in services may not be a reason for termination of assistance.

If termination is necessary, the CACFC must provide a 30-day written notice to the landlord and client, containing a clear statement regarding the reason for termination and an opportunity for appeal. If an individual chooses to appeal, assistance must continue through the entire appeals procedure.

If a tenant does not leave in a cooperative manner after receiving notification and a three day notice, then it may be necessary to evict the tenant. If this occurs, the tenant may be terminated from the program.

Community Action’s PSH programs will continue to work with the landlord and tenant toward the least disruptive departure possible. Community Action’s PSH programs will continue to pay the housing assistance portion of the rent as long as the individual is a program participant and in accordance with the lease. The tenant will also be responsible for their portion of the rent until the unit is vacated and will be responsible for any damages.

An exit form must be completed for each participant leaving the program. This form is to be completed and reported to HMIS data entry staff within 5 days of the participant’s exit.

# Death

Rent will be paid for the lesser of up to the date the tenant’s possessions are removed or for up to 14 days after a tenant has died. If the family has not removed the possessions they must pay market rent for any additional time needed.

Surviving member(s) of a household have a right to rental assistance until the end of the grant period under which the deceased member was a participant. If an adult surviving family member has a qualifying disability the subsidy can be transferred to their name as the head of household and be continued in accordance with program regulations.

# Subsidy Portability

If an individual elects to move from their current home the CACFC must ensure the client can chose any unit they wish that is both rent reasonable and under Fair Market Rent within Fayette County, Ohio.

Annual Re-Certifications  
All Community Action’s PSH programs tenants must be reviewed and re-certified for Community Action’s PSH programs assistance annually. The re-certification date for an annual certification is one year from the original certification date, effective the first day of the month that the tenant began receiving Community Action’s PSH programs assistance. For example if the tenant was admitted October 11, 2007 then the re-certification effective date is October 1, 2008. When processing re-certifications, the CACFC needs to complete re-certification in a timely and efficient manner. Re-certification should happen within 30 days of the original entry date or previous re-certification.

The steps are as follows:

1. 1st Notice - send 90 days in advance of the re-certification anniversary date. The notice must state that the tenant has until the 10th of the month preceding the anniversary date to contact the office to begin re-certification.
2. 2nd Notice – send approximately 30 days after the previous notice to tenants who have not responded. Content is the same as the 1st notice in addition to stating that if the tenant does not respond by the 10th of the month preceding the anniversary date, the owner may suspend assistance payments on the re-certification date.
3. 3rd Notice/Notice of Intent to Terminate –is give on the first of the month preceding the anniversary date to tenants who have not yet responded. The Notice must state that the tenant has 10 days to re-certify. If the tenant does not respond within those ten days, assistance may be suspended or terminated, and the rent may be increased to market effective on the re-certification anniversary date, with no 30-day notice of increase. IV. Meet with the tenant and obtain information on their current income.
4. Verify income and assets using the proper forms and update releases of information.
5. Calculate tenant’s rent and assistance payment by completing the Rent Calculation Worksheet.
6. Provide written notice to tenant of any change in rent, giving at least 30 days’ notice for rent increases unless the tenant is late in responding to re-certification notices.
7. Perform an annual inspection of the unit to ensure HQS compliance
8. If CACFC and tenant both comply with requirements, changes in tenant rent and assistance payment are both effective on the anniversary date.
9. Update the lease with the landlord, tenant and applicable providers.

**Annual Recertification Checklist**

1. Interim Recertification Document (Printed from HMIS)
2. Update Income (Must show 3rd party written and verbal attempts)
3. HMIS Release Form
4. Fayette County Universal Release
5. Inspection
6. Updated Lease

## CACFC Late

If the CACFC is late in completing the re-certification, a thirty-day notice of any rent increase must be given, regardless of the anniversary date. For rent decreases, the CACFC must apply the change retroactively to the anniversary date.

## Tenant Late

Tenants who respond after the cut-off date in the 3rd Notice may have their assistance suspended or terminated as of the scheduled effective date.

If the tenant complies with the re-certification requirements after the 10 day period stated in the 3rd Notice, but before the anniversary date, the tenant is considered late but may be re-certified effective retroactively to the anniversary date.

Tenants who respond after the 10th of the month preceding the anniversary date but before the anniversary itself should be asked why there was a late response. If there are extenuating circumstances such as hospitalization or family emergency which prevented the re-certification then the assistance may not be suspended. The new tenant rent is effective on the date noted in the 30-day notice.

If the CACFC denies extenuation circumstances, then no 30-day notice is required and the new tenant rent amount is due on the anniversary date. The tenant must be informed in writing of the decision and their right to appeal through the Housing Appeals Procedure.

## Tenant Failure to Comply

Procedures for Tenants who Fail to Meet Re-certification Requirement

1. Tenant may be immediately terminated from COMMUNITY ACTION’S PSH PROGRAMS; OR
2. Tenant may be given the opportunity to retroactively repay his/her portion of the rent to the CACFC in lieu of immediate termination. For example:
   1. 50% of account balance paid. The remaining balance must be paid over a term not to exceed 12 months with a documented payment plan; or
   2. Establishment of a Representative Payee and a documented payment plan not to exceed 12 months; or
   3. Issue has been adjudicated through the Community Action’s PSH programs Appeals or Grievance Process.

# Interim Re-Certifications

A tenant may be terminated if an increase in income is not reported or if a decrease in income was caused by a deliberate action of the tenant to avoid paying rent.

Tenants are required to report and provide verification of any income or household member changes within 10 business days from the date of such change. The CACFC must process an interim adjustment when the income increase is significant enough to result in the utility and rent payment to exceed FMR. The CACFC may refuse to process an interim re-certification only when the CACFC receives confirmation that the decrease/increase will last two months or less.

The CACFC must process all requests for decrease in household income regardless of amount. If the tenant fails to report and provide verification of income decrease within 10 business days, then the interim change will be effective for the same month the tenant submitted the documentation to the CACFC.

Periodic income should be annualized at Annual Recertification. An interim recertification for periodic income can be processed only if periodic income decreases or increases for a period of 120 days and should be annualized from recertification date.

The steps in processing interim adjustments:

1. Meet with tenant to obtain new information on income.
2. Verify only those factors that have changed.
3. Complete a new Rent Calculation Form.
4. Send amendments to the landlord, tenant and applicable service providers.
   1. For rent increases:
      1. First day of the month following required 45-day notice.
      2. Verify new rent falls with the Rent Reasonable Range
   2. For rent decreases: first day of the month following the date of the change.

# Reasonable Accommodations

Section 504 of the Fair Housing Act enables individuals with disabilities the ability to request a “reasonable accommodation” in rules, polices, practices or services in order to participate fully in a program.

Requests must be submitted in writing to the CACFC and will be forwarded to the Operations Manager for decision.

A written request for a reasonable accommodation must include reliable disability related information that:

• Verifies that the individual has a disability that falls under the Fair Housing Act and

• Describes the needed accommodation and

• Shows an identifiable relationship between the requested accommodation and the individual’s disability

Depending upon the circumstance this information may be provided by the individual him or herself, a doctor or medical professional, a peer support group, a social service provider, or a reliable third party.

CACFC may refuse to provide a requested accommodation if providing the accommodation would constitute an undue financial and administrative burden or fundamental alteration of the providers’ housing program.

# Grievance & Appeals Process

Community Action’s PSH programs is a HUD funded program administered by the Community Action Commission of Fayette County. The goal of the programs is to empower consumer choice, independence, and control by helping to provide safe and decent housing, a foundation of recovery and hope. The Housing Program recognizes that you may not agree with Community Action’s PSH programs decision. In these cases, you have the right to appeal.

Informal Agency Processes or Mediation is an option available anytime throughout the process. Any individual filing an appeal has the right to have a designated representative or advocate throughout the entire process.

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

RESPONSIBILITIES:

Agency Administration and Staff shall:

* Region 16 will make available to housing participants, potential housing participants, and other interested parties the Grievance Packet (includes the Grievance Policy, Complaint form and Appeal form).
* It is the intent of Region 16 Housing Staff that participants always be treated with respect and their current housing circumstances will be kept in the strictest confidence.
* A copy of this policy will be clearly posted in appropriate agency offices.
* All housing participants will be informed of their rights at program enrollment.
* Housing Participants are provided a full explanation of their participant’s rights policy and a copy will be provided upon enrollment.
* Staff 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 Housing Director decides, unless the reason for program exit was a safety violation (violence, abusive behavior, illegal drug use on premises, etc.).
* Each housing participant will have the opportunity to express his/her feelings concerning their 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 the housing staff member involved. An open discussion will usually clear up the

misunderstanding and solve the problem. If the matter remains unresolved, move on to step 2.

**2.**  Request a grievance form, complete it, and forward completed form to: Homeless Director Stacey Johnson If participant is unable to fill out the grievance form, they may request an in-person meeting with the appropriate Program Director (PD). PD will document and review the grievance, then respond in writing to the participant within five (5) working days of receipt of the complaint. If the participant remains dissatisfied with the resolution offered, s/he may take the next step. \*\* or in the case that the grievance is with the Peace House DV Director, the completed grievance form should be forwarded to the Homeless Director for review. If grievance is with Homeless Director, the grievance form should be forwarded to the Executive Director.

**3.** Participant may **r**equest that their complaint form be forwarded to the Executive Director for review. S/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 and will update the appropriate housing staff.

If the final decision is not satisfactory to you, you may file a request for an administrative appeal. Submit a completed 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 Grievance Form

|  |  |
| --- | --- |
| Participant Name: | Date: |
| Housing Program that provided services: Time: am pm  Please describe your complaint (who, what, when, where): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| Please describe why you believe the action was wrongful, illegal, or unlawful:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Please describe the resolution you are seeking for this complaint:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  Participant’s Forwarding Address: | |
| Participant’s Telephone Number: | |
| Participant’s Signature: | |
| **For Agency Use Only** | |
| **Received By:** | **Date Received:** |
| **Date of follow up with Participant**:  **Was a resolution offered? YES NO Did participant accept the resolution? YES NO** | |
| **Comments:** | |

**Housing Director Signature:**

Date:

If Step 3 instituted:

**Executive Director Signature:**

Date:

### Region 16 Grievance Appeal Form

|  |  |
| --- | --- |
| Participant Name: | Date: |
| Housing Program that provided services: | Time: am pm |
| Please describe the decision you wish to appeal. Please note any relevant dates, locations, witnesses, or names or other persons involved. You may use separate paper if necessary.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| Participant’s Forwarding Address: | |
| Participant’s Telephone Number: | |
| Participant’s Signature: | |

|  |
| --- |
| Outreach General Outreach Outreach will take place on a monthly basis through regular services and media channels, and the summer and winter Point-in-Time Counts.  Regular service activities include conducting outreach for participants through participation at the Continuum of Care, Family and Children First Council, and the Ministerial Association meetings. Service outreach will also include meeting with front line staff at various social service agencies and explaining the eligibility criteria for the program. The Continuum of Care regularly engages with local law enforcement to make them aware of available services and law enforcement regularly contacts the CoC when they come into contact with homeless individuals. Additionally, staff works with local landlords and will utilize this as a channel to conduct outreach to individuals being evicted from housing. Regular media channels include the local radio stations, the local newspapers, and the local news channels. Special outreach must also be conducted. RRH Case Managers shall be culturally competent in their efforts to bring individuals into the program. This may mean reaching out to special interest groups or placing marketing materials where special populations can be found.  Outreach at the Point in Time Count should include a Project Homeless Connect. The Project Homeless Connect will feature: representatives from social service agencies including Job and Family Services, the Homeless Shelter, the Single Point of Contact for Homeless Prevention, counselors from Mental Health Clinics, trained Benefit Bank Counselors and the SSI Ohio Counselor, as available. Information available includes brochures on 2-1-1, local food pantries, housing providers, and landlord lists. Along with the social service supports, applications, a soup kitchen, clothing, blankets, and haircuts will also be provided. Press releases regarding the count will be placed with local media and flyers will be distributed at targeted locations throughout the county.  Regular service and media outreach will encourage individuals to report individuals and families sleeping on the streets to the RRH Case Manager. Street Outreach Case Managers will investigate reports of individuals and families living in places not meant for human habitation. Case Managers will go during daylight with another Case Manager to determine whether or not the report was valid.  Flyers will be placed quarterly at laundry mats, grocery stores, local food pantries, social service agencies, the police department, the sheriff's department, elderly and disabled properties, disabled programs, and other locations to announce the availability of assistance.  Case Managers will lead annual street counts to locate individuals living on the streets. Targeted locations include: woods, abandoned buildings, parking lots, truck stops, ­­­­­­­­­­­­­­­etc.  Landlord OutreachLandlord Outreach will take place annually on the local Continuum of Care level. Local housing providers and private landlords should be invited to a Continuum of Care meeting. Once annually, the meeting should feature a brief presentation on each program available in the community as well as information on Fair Housing. Landlord Outreach serves as the foundation for securing stable housing for our most vulnerable clients. Domestic Violence Policy & Procedure The CACFC recognizes the importance of connecting domestic violence survivors with the necessary interventions, supports, and educational resources to stabilize them during and following an incident of homelessness. Domestic violence survivors often face significant barriers to housing, developing support networks, and employment/income maintenance. Through community planning, policy, and process the CACFC will reduce the barriers homeless domestic violence survivors and their dependents face while accessing services and increase their ability to escape the cycle of violence and poverty. It is because of these barriers we have established the following policies and procedures. Please note that these policies also protect victims of sexual assault, dating violence, and stalking.  The CACFC is concerned about the safety of participants in homeless assistance programs, and such concern extends to participants who are victims of domestic violence, dating violence, sexual assault, human trafficking, or stalking. As stated by HUD, CoCs should be able to provide individuals and families fleeing violence access to housing and trauma-informed, victim-centered services that prioritize the survivor’s safety needs, accommodates their unique circumstances, and maximizes client choice.  *Philosophy* The survivor knows best. Advocates should recognize that the survivor is the expert on their own situation, knows the abuser better than anyone, and is already doing safety planning on a regular basis as part of their survival, though they may not label it as such. Simply accessing services has required safety planning. CACFC housing programs utilize empowerment methods and begin by asking what they have already done to stay safe, and validating their efforts. The survivor should take the lead in developing their housing plan; our job is to facilitate the process and offer information. Each situation is different, and different things work for different people. Be flexible in how you plan with survivors in order to accommodate a range of differences. Recognize the impact that cultural background, experiences, trauma, and/or values may play.  *Objectives* • Survivors escaping domestic abuse are able to access a range of housing, financial assistance, and case management services; • Survivors receive consistent and comprehensive services; • Survivors are able to make an informed choice about the choices available to them to enable a safe and sustainable solution to their housing stability.  *Scope*  This protocol will apply to all survivors of domestic violence accessing emergency shelter, rapid re-housing, or permanent supportive housing.  *Domestic Violence Screening*  The question to be asked for every person accessing housing services should be asked as follows: Have you ever been pushed, kicked, hit, or otherwise hurt by an intimate partner or family member? If the question is answered affirmatively, the next questions are:  Can you tell me a little more about the situation?  When did this/these occur? Data is to be recorded via the HMIS system. All domestic violence survivors must be entered as anonymous clients. Domestic Violence shelters receiving VAWA funds do not use HMIS and homeless programs must record these individuals as anonymous clients.  The CACFC has a domestic violence addendum form. This form is available on the internal homeless programs page. These should be added to the file as appropriate, as this form contains information that will aid in participant safety. Visit <https://www.cacfayettecounty.org/internalhomeless/>  *Assessment* The assessment process for the programs is designed to be minimally intrusive and focuses primarily on rental history, income, and other potential barriers to housing. The Coordinated Intake Documents should be mailed or hand delivered. Faxing or email such information could pose a threat the safety of the survivor and their children.  *Services* CACFC provides an array of services to the households in its homeless/prevention programs, including, case management, financial assistance, and landlord mediation. All of the services provided by CACFC are “participant-driven.” This service philosophy is driven by the premise that, given choices and opportunities, participants will work to ensure their own safety and success. CACFC believes that, if services are meaningful to participants’ goals, they will actively remain engaged in services. Services begin with the first contact with homeless program in the form of a crisis intervention addressing the immediate pressing needs of the household. This includes ensuring household safety and a possible placement in permanent housing.  A housing search begins immediately. Short-term goals are developed, and CACFC provides direct financial assistance and advocacy with landlords to help households access housing. Financial assistance can range from short-term rental assistance to assistance with accessing permanent housing subsidies. CACFC has built strong relationships with area apartment management companies and landlords. Because CACFC is there to support its participants, the landlords are more likely to rent to the participants, even when they have spotty rental histories or as yet insecure income.  Once housing is obtained, a case manager begins to work with the household on issues that will promote housing retention. Services offered during this phase include home visits, job search and job training referrals, case coordination with other systems, linkages to legal services, and help with budgeting and goal planning. Eventually, work begins on long-term goals, including increasing household income and helping survivors navigate public and community-based services independently. CACFC has worked with mainstream and community-based social service providers to make it easier for its participants to access assistance. The relationship with mainstream providers also helps facilitate referrals of households in crisis to CACFC services. Financial subsidy is commonly provided for 3 months to 12 months, but other supportive services offered to families may last permanently if client qualifies. All of the aforementioned services should be offered but cannot be required.  **Domestic Violence during the Program –**  In accordance with the Violence Against Women Act (VAWA), CACFC homeless programs providing housing or rental assistance must allow participants who are victims of domestic violence, dating violence, sexual violence, human trafficking, or stalking to request an emergency transfer from the participant’s current unit to another unit.  The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether CACFC has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.  This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that the CACFC is in compliance with VAWA.  **Eligibility for Emergency Transfers**  A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD’s regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.  A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.  Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.  **Emergency Transfer Request Documentation**  To request an emergency transfer, the tenant shall notify their case manager and submit a written request for a transfer to 1400 US Route 22 NW, Washington Court House, Ohio 43160. CACFC will provide reasonable accommodations to this policy for individuals with disabilities. The tenant’s written request for an emergency transfer should include either:  1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under CACFC’s program; OR  2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant’s request for an emergency transfer.  CACFC may request documentation of the domestic or sexual violence. If requested, the participant may provide any one of the following forms of documentation: 1. HUD model form located on the homeless crisis response program page 2. Signed documentation from a victim service provider, an attorney, a medical professional, or a mental health professional from whom the participant has sought assistance relating to domestic violence, dating violence, sexual violence, or stalking, or the effects of abuse; or 3. A police report or court record.  If a housing provider receives reports or documentation of domestic or sexual violence that contain conflicting information (including certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator), the housing provider may require a participant to submit third-party documentation, as described in 2 & 3 above and in 24 C.F.R. 5.2007(b), within 30 calendar days of the date of the request for the third-party documentation. If third party documentation is not received or third party documentation presents conflicting information, the housing provider must contact the City’s Office of Domestic Violence Strategies for case consultation.  **Confidentiality**  CACFC will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives CACFC written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about CACFC’s responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.  **Emergency Transfer Timing and Availability**  CACFC cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. CACFC will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. CACFC may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.  If CACFC has no safe and available units for which a tenant who needs an emergency is eligible, CACFC will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant’s request, CACFC will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan. CACFC staff should connect victims to the Ohio Domestic Violence Network at 1-800-934-9840. ODVN, when funding is available, has up to $1,200 in relocation assistance funding that can be tapped if CACFC resources cannot feasibly cover the costs. This program also pays for moving expenses or utilities that CAC programs may not have the funding to cover.  **Safety and Security of Tenants**  Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.  Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).  Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network’s National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at https://ohl.rainn.org/online/.  Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.  For help regarding human trafficking, you may visit the National Human Trafficking Hotline website at https://humantraffickinghotline.org/ or contact the National Human Trafficking Hotline–available 24 hours a day, 7 days a week, in more than 200 languages–by calling 1-8883737-888 or texting HELP to BEFREE (233722). Callers can dial 711 to access the Hotline using TTY. Additional options include live chat at https://humantraffickinghotline.org/chat or email to help@humantraffickinghotline.org.  **Non-transferring Household Member(s) & Lease Bifurcation**  If a family separates in order to affect an emergency transfer and the non-transferring household member is engaged in criminal activity directly relating to domestic violence, sexual violence, dating violence, human trafficking, or stalking, the housing provider may bifurcate the lease, or remove said household member from the lease in order to evict, remove, terminate occupancy rights, or terminate assistance to the non-transferring member. In terminating assistance or occupancy rights of the non-transferring household member, the housing provider must follow its written termination policy and grievance procedure, including formal due process. In removing the abuser or perpetrator from the unit, the housing provider must follow Federal, State, and local eviction procedures.  When a household receiving assistance separates, the household’s assistance shall continue for the household member(s) who are not evicted or removed in a program for which the remaining household member(s) are eligible.  **Perpetrator in the Home**  If the abuser returns to the home at the request of the survivor, home visitors may choose to conduct off-site home visits. Clients will not be judged for their decision to return to the abuser. Case Managers must understand the dynamics of abuse.  **Suspicions of Violence**  If it is suspected that violence is taking place in the home, the case manager should educate the survivor when they are alone of resources in the community to assist victims of domestic violence and conduct safety planning. Case Managers should remain non-judgmental and empower the survivor.  **Prior Domestic Violence Charges**  Prior domestic violence charges do not bar a household from entering housing programs. CACFC believes all individuals have the right to access housing. Facility-based CACFC programs may place violent offenders at alternative shelter for safety reasons. The emergency shelter is the county’s domestic violence shelter. However, housing first requires that no one be denied homeless assistance due to criminal history unless there is a clear and imminent threat to staff or program participant safety. The emergency shelter should utilize flexible funding sources to place these individuals at hotel/motel or, if they will accept services, at a singles shelter in a neighboring county.  Homeless Youth Policy Purpose The CACFC recognizes the importance of connecting homeless youth with the necessary interventions, supports, and educational resources to stabilize them during and following an incident of homelessness. Homeless youth often face significant barriers to education due to housing stability. Through community planning, policy, and process the SCOR will reduce the barriers homeless children face in education and therefore their ability to escape the cycle of poverty. Homeless children often are unable to meet enrollment requirements, miss more school, lack educational continuity, and face the additional burdens that poverty imposes upon their ability to assimilate, find stability, and thrive in the educational environment. It is because of these barriers we have established the following policies and procedures for all emergency shelter, rapid re-housing, and permanent supportive housing programs.  Program Intake: Upon entry to the program staff will conduct the coordinated entry assessment.  Parents with school aged children will be informed of their rights under McKinney-Vento upon entry into the program. Under McKinney-Vento homeless youth, defined as “children and youth who lack a fixed, regular, and adequate nighttime residence, including children and youth living in programs, transitional housing, cars, campgrounds, motels, and sharing the housing of others temporarily due to loss of housing, economic hardship, or similar reasons” have the following rights:   * Students who are homeless can remain in their school of origin, even if their temporary living situation is located in another school district or attendance area, if that is in their best interest. Schools must provide transportation. * Children and youth who are homeless can enroll in school and begin attending immediately, even if they cannot produce normally required documents, such as birth certificates, proof of guardianship, immunization records, or proof of residency. * Every school district must designate a homeless liaison to ensure the McKinney-Vento Act is implemented in the district. Homeless liaisons have many critical responsibilities, including identification, enrollment, and collaboration with community agencies.   Program staff will then provide the telephone numbers to the schools and transportation facilities available for their school of origin. When the parent and/or youth do not feel the school of origin to be an appropriate choice or in their best interest, families and youth will be referred to the school district of their choice.  Program staff will ensure that parents call the school and transportation within 48 hours of program entry. If the parent does not call the school program staff will call on their behalf.  Program staff will refer children from birth to preschool ages to Help Me Grow, Early Head Start, and/or Head Start as appropriate. Homeless children are given a preference for those programs.  Within 48 hours of entry into the program staff will ensure that residents report their change of address to Job and Family Services. A Benefit Bank application will be completed as appropriate. A quick check for program eligibility for programs will be completed for every family entering program.  Parents will also be referred to the following agencies: local food banks, community meals, faith-based organizations that provide necessary items, school supply drives, and the nutrition and parenting classes offered onsite at the program. If necessary, school-aged children will be given Goodwill Vouchers for clothing. All children will be referred to the local library to obtain a library card.  As appropriate, parents will be referred to: Board of DD, CLUSTER, Scioto Paint Valley Mental Health, and volunteers who tutor children having troubles with their school work.  When in shelter, second shift staff will oversee the 2 hour dedicated time-period for children to complete their homework and studies.  School aged children’s bath and bed times will be scheduled to be consistent with the necessary sleep and preparation to have a productive, healthy school day while living in congregate facilities.  The program point of contact will email or the phone the liaison to inform of the child’s homeless status.  Collaboration:  The CACFC provides the leadership for the Regional Continuum of Care. In that capacity, it is the duty of the CACFC to collaborate among local boards to raise awareness of services and supports for homeless children and youth. A representative from CACFC will serve on the Continuum of Care, Family & Children First Council, Victim Response Team, and the Safe and Healthy Schools Board. The Continuum of Care Coordinators will also coordinate with the local schools during the point in time counts to identify homeless children and provide parents with information regarding their rights under McKinney-Vento. Homeless Liaisons by County: This list is maintained on the Ohio Department of Education webpage at <http://education.ohio.gov/Topics/District-and-School-Continuous-Improvement/Federal-Programs/Elementary-and-Secondary-Education-Act/Programs-Administered-Under-ESEA/McKinney-Vento-Resources-for-Awareness>. If the webpage changes, staff may google homeless liaison and Ohio to find the updated page. This happens periodically when there is a change in leadership at the state level.  The most recently downloaded and sorted form locally can be found on the HCRP page: [Region 16 Homeless Housing Programs | Community Action Commission of Fayette County (cacfayettecounty.org)](https://www.cacfayettecounty.org/region-16-homeless-housing-programs/) under the heading Community Resources for the homeless and at-risk, titled School Homeless Liaison Contact Information.  Designated Staff for Youth PolicyClinton County – Amber Taylor (Clinton County Homeless Shelter)  Fayette County – Gaye Huffman (Community Action)  Highland County – Greg Hawkins (Highland County Homeless Shelter),   Pickaway County – Elizabeth Trainer (Community Action), Penny Pollack (Haven House)  Ross County – Linda Hoover (Community Action) Transition Aged Youth Policy The CACFC has identified the following values to guide the development of this transition-aged youth policy, hereafter referred to as TAY.   * Youth homelessness is unacceptable. All young people deserve a safe place to grow and thrive. * Youth homelessness is solvable * Youth homelessness is about more than the loss of housing; it’s about the loss of critical connections to family, community, school, and employment. * Youth choice should be at the forefront of all program design. * Youth will be served within their own community, if they so choose. * Effective, youth-dedicated programs recognize, respect and accommodate youth at all stages of development. * Youth homelessness disproportionately affects LGBTQ populations. Youth services must be culturally competent.   Given the special needs of the TAY population, certain measures will be taken to account for these needs. Staff will either place TAY in PSH or RRH, depending on their TAY-VI-SPDAT.  Outreach – Outreach should take place at the following: Children’s Services, ODJFS’s Bridges Programs, Juvenile Probation, High Schools and Vocational Schools, local colleges, Youth Recreational Centers/Programs, parks, libraries, Help Me Grow, Head Start, and Faithbased Organizations.  Bridges Offices:  Central Office - c.region@cfhcohio.org (614) 655-8259 – Fayette, Pickaway and Ross Counties  Southwest Region - sw.region@cfhcohio.org (614) 568-6596 – Clinton and Highland  For information on the statewide program for youth aging out of foster care visit <http://bridgestosuccess.jfs.ohio.gov/about/about-bridges/>.  **Assessment** – TAY should complete the TAY-VI-SPDAT. This assessment had language and scoring modified to reflect the differences in this population.  **Case Management/Services** – Case Management and services are more intensive and program stays are longer for TAY. Youth will need additional life skills training and staff must be prepared to assess and teach youth these skills. This may include: budgeting, credit repair, managing utilities, house cleaning, hygiene, finding and keeping a job and accessing mainstream resources. Case Managers, when it is safe to do so, should work to reunify youth with their families.  To access a youth life skills assessment, visit <https://caseylifeskills.secure.force.com/clsa_homepage>. You can conduct the assessment at entry and at selected follow up intervals. Completing this online will result in an online strengths-based plan that you and the youth can work on together. Assessment data is retained for two years.  Youth have a tendency to be more fluid and transient in living situation. The program should be open to shared housing situations and allowing individuals to move in mid-lease.  **Financial Assistance** – Staff should expect to spend more time/week per client. While staff should use the same policies and procedures by tailoring financial assistance to individual needs, they can expect youth to take more assistance on average.  **Training** – Working with youth requires the use of the Positive Youth Development Framework. Program staff should familiarize themselves with this best practice and consider how they may engage with youth. Without meaning to, we may often make decisions for youth without engaging them or assume they do not have the ability to make sound decisions.  Trainings on YEP:  <http://actforyouth.net/youth_development/professionals/manual.cfm>  <https://www.hudexchange.info/resource/5138/ending-youth-homelessness-a-guidebook-series/?utm_source=Youth.gov&utm_campaign=Reports-and-Resources&utm_medium=federal-links>  <https://rhyclearinghouse.acf.hhs.gov/sites/default/files/docs/16952-2008_Positive_Youth_Development.pdf> Record Retention Policy CACFC staff must comply with the agency’s record retention policy and this homeless program retention policy. The fiscal policy outlines agency-wide processes such as audits, personnel files, agency board minutes, tax documents, payments, leases, etc. This policy dives more deeply into homeless program requirements and references homeless program efforts. Homeless program information is marked with an asterisk. (\*)  Homeless program-specific information shall be maintained based on the following:  **Permanently** Audit reports Board minutes, by-laws, organizational chart, articles of incorporation Continuum of Care minutes and regional continuum of care minutes\* Charts of accounts Checks for important purchases/payments Correspondence – legal and important matters Deeds, mortgages Depreciation schedules Insurance records, current accident reports, claims, policies, ext. (current and expired) Journals Patents, copyrights, trademark registrations, and related documents Point in Time count records (volunteer hours, HMIS reports, unsheltered data forms, etc) \* Program policies\* Property analysis by outside appraisers Property records: costs, year-end trial balances, depreciation schedules, blueprints/plans Retirement/pension records  Staff training and certifications \* Tax returns and worksheets Training manuals Year-end financial statements  **Seven Years:** Accident reports/claims – settled cases Accounts payable/accounts receivable ledgers and schedules Bank Statements and Reconciliations Cash Receipt & invoices Checks – cancelled with exceptions listed Contracts, mortgages, notes, leases – expired Expense analysis/expense distribution schedules Garnishments Inventories Invoices – to customers, from vendors Memoranda of Understanding (HCRP and PSH projects)\* Notes receivable ledgers and schedules Payable & receivable ledgers Payroll records and summaries Personnel files –terminated employees Purchase orders: from purchasing department Subsidiary ledgers Timesheets Vouchers: payments to vendors, employees, etc. Withholding tax statements  **Four years:** Homeless Programs Client Files\* HUD CoC APR and backup documentation\* ODSA Reports and backup documentation (every 6 months)\*  **Three years:** Employment applications Federal grant documents (following the submission of the final report) Insurance policies – expired Internal audit reports Petty cash vouchers Records for specific grants and client files, unless otherwise stated by the funder  **Two years:**  Bank reconciliations Correspondence – general, with customers/vendors Deposit slips  **One year:**  Purchase orders – non-purchasing department  In cases where unresolved audit questions arise, CACFC will retain all records relevant to the audit questions for the time fr4ame necessary for resolution of the question.  **Record Destruction**  After the seven-year retention time has expired a shredding company is contacted to come onsite to perform the record destruction. All programs are notified of the upcoming visit to have adequate time for preparation. Equal Access CACFC homeless projects serving families must ensure they comply with the Equal Access Rule, as outlined by HUD. The Equal Access Rule outlines the federal definition of ‘family’ for purposes of receiving assistance from certain programs. For CACFC homeless projects, the definition of ‘family’ is as follows: *Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.*  What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. CACFC homeless projects cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member’s family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity. More specifically, all CACFC homeless projects with dedicated family beds/units must serve families, regardless of the marital status or sexual orientation of the adults.  There are some very limited exceptions to this rule, however, for those programs funded through special initiatives under the annual CoC Competition. For example, the Shelter Plus Care grant funded in the 2013 competition only serves singles because of the limited requirement based upon the funding application.  Keeping Families Intact  CACFC homeless programs serving families are required to serve the intact family, where desired by the client. Family members, regardless of age, gender, or other factors, cannot be separated from other family members during their program stay.  **Serving Transgender Persons in Emergency Shelters and Other Sex-Segregated Facilities** CACFC emergency shelters must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation, or gender identity. Although emergency shelters with shared sleeping areas or bathrooms are permitted to inquire about sex or gender identity for purposes of determining room assignment, best practices suggest that where there is uncertainty about sex or gender identity shelter providers should ask where individuals feel most comfortable sleeping. This may mean that the person should be provided with a private changing, shower, and/or sleeping space, or stagger use of facilities so that the person may shower and change alone. Decisions about how and where someone is housed should be made on a case by-case basis strongly taking into account the person’s preference about where to sleep, and keeping safety a priority.  In situations where providers are unsure of a person’s sex or gender identity, providers may not ask for documentation of sex or gender. The best way to proceed if a provider is unsure is to tell a client that the agency provides shelter according to the gender with which the client identifies. Do not ask, “What is your sex/gender?” Do say, “This is a shelter for women, if you would rather be in a different shelter, let us help you find one where you feel safe and comfortable.” It is understood that not every facility can accommodate every gender expression. The spirit of this guidance is about helping people to feel safe and comfortable in their temporary accommodations. This may mean telling a client what the local options are, without asking about their gender, and doing the most possible 7 to get that person to a place they want to be. Gender-based violence can be inflicted on transgender people and providers are obligated to protect transgender people from such violence the same way they protect women, for example, from violence.  CACFC emergency shelters and other homeless program providers should review the HUD notice, Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities, in order gain a comprehensive understanding of how the notice affects both clients and providers, and guides protocols, policies, and procedures. The notice can be found at https://www.hudexchange.info/resource/4428/notice-cpd-15- 02-appropriate-placement-for-transgender-persons-in-single-sex-emergency-shelters-and-other-facilities.  PSH Program Staffing and Training1. CACFC must adequately staff homeless programs by qualified personnel to ensure quality service delivery and effective program management.  ● PSH staff have appropriate knowledge of or experience working with individuals and/or families experiencing homelessness  ● PSH projects maintain written job descriptions that address the major tasks to be performed by each position (See job description in the appendices of this manual)   * PSH projects provide standardized training on best practices to all new PSH staff   2. Within 1 month of their start date, PSH Case Managers will receive standardized training on the following: BOSCOC Onboarding Toolkit, this policy manual (including its safety protocol), landlord/tenant law, and case management.  The Homeless Programs Director is responsible for overseeing this effort.  The onboarding toolkit for training new staff is located at <https://cohhio.org/member-services-2/boscoc/boscoc-onboarding-toolkit/>.  They should also review information and all of the trainings located within the Rapid Rehousing Toolkit. <https://cohhio.org/member-services-2/boscoc/toolkit/>. Staff should focus on housing identification, financial assistance and diversion. Best practices are discussed in the next section and is due within six months of the start date. While PSH and RRH are not the same, the key difference is the level of care. Most PSH households will require more intensive services.  Next, PSH staff will meet with the director for an in-person training. This will be followed by shadowing another case manager for two days. This training must include a home visit and an assessment.  3. Homeless Programs Director ensures all new homeless program staff are trained within 6 months of their start date on the following best practices, at minimum:   * Housing first practices - <https://cohhio.org/member-services-2/boscoc/toolkit/#HousingFirst> * Harm reduction practices - <https://cohhio.org/member-services-2/boscoc/toolkit/#HarmReduction> * Trauma-informed care - <https://cohhio.org/member-services-2/boscoc/toolkit/#TraumaInformedCareResources> * Progressive Engagement - https://cohhio.org/member-services-2/boscoc/toolkit/#ProgressiveEngagementResources * Motivational Interviewing - <https://cohhio.org/member-services-2/boscoc/toolkit/#MotivationalInterviewingResources> * Domestic Violence - <https://cohhio.org/wp-content/uploads/2018/10/Protecting-Survivors-Of-DV3-Read-Only.pdf> * Completion of training is documented by PSH program management on the   Staff Training form and kept on file  Staff must also watch the appropriate webinars available on the COHHIO website. These are available at <https://cohhio.org/member-services-2/tta/current-training-materials/>.  CAC homeless programs encourages homeless program staff to engage in annual continuing education. If a Case Manager consistently fails to meet BOSCOC Performance Standards, they may be required to recomplete onboarding and/or best practice training. Continuing education activities should be submitted to the Director monthly with the board report. |

# Appendices

## Sample Inspection Letter

[Date]

[Landlord and/or Managing Agent Name]

[Landlord and/or Managing Agent Address]

Dear [Landlord and/or Managing Agent]

A Housing Quality Standard inspection was completed recently on the apartment located at [Address] where [Applicant Name] would like to reside. This inspection was conducted to determine if the unit meets the minimum standards established by the U.S. Department of Housing & Urban Development. These standards have been established to ensure that tenants who receive assistance are living in housing that is decent, and sanitary.

The inspection indicates that the unit [does/does not] meet these standards. I have enclosed a copy of the inspection for your records [and I have highlighted items that require correction. I will perform an inspection in thirty-days to ensure that necessary repairs have been completed].

If repairs have not been completed by {30 days from the initial occupancy agreement} then payment will be suspended until repairs are made.

If you should have any questions, please do not hesitate to contact me at ###-####.

Sincerely,

[signed name and date]

[printed name, title]

## EPA Pamphlet

PROTECT YOUR FAMILY FROM LEAD IN THE HOME DISCLOSURE OF INFORMATION ON LEAD-BASED PAINT AND/OR LEAD-BASED PAINT HAZARDS AND EPA BROCHURE ON HOW TO PROTECT YOUR FAMILY FROM LEAD IN YOUR HOME

Lead Warning Statement - Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, landlords must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Tenants must also receive a federally approved pamphlet on lead poisoning prevention.

Landlord’s Disclosure

A. Presence of lead-based paint and/or lead-based paint hazards (Check (1) or (2) below):

(1) \_\_\_\_ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

(2) \_\_\_\_ Landlord has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Date) (landlord)

B. Records and reports available to the landlord Check (1) or (2) below):

(1) \_\_\_\_ Landlord has provided the tenant with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(2) \_\_\_\_ Landlord has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(Date) (landlord)

Tenant’s Acknowledgment

C. Tenant has received copies of all information listed above. \_\_\_\_\_ (tenant’s initials)

D. Tenant has received the pamphlet Protect Your Family from Lead in Your Home. \_\_\_\_\_ (tenant’s initials)

Agent’s Acknowledgment

E. Agent has informed the landlord of the landlord’s obligations under 42 U.S.C. 4852d and is aware of his or her responsibility to ensure compliance. \_\_\_\_ (agent's initials)

Certification of Accuracy The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Landlord \_\_\_\_\_\_\_\_\_\_Date \_\_\_\_\_\_\_\_\_\_\_\_Tenant \_\_\_\_\_\_\_\_\_\_Date

## Sample Termination Letter

[CACFC Letterhead]

[Date]

[Tenant Name]

[Tenant Address]

Dear [Tenant Name]:

We are writing you today to inform you that your Community Action’s PSH programs Program (COMMUNITY ACTION’S PSH PROGRAMS) subsidy is being terminated effective \_\_\_\_\_\_\_\_\_\_\_\_. The reason for subsidy termination is:

You have vacated your apartment without proper notice

You have not responded for requests for information for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

You no longer meet the eligibility criteria because \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

You have failed to make your payments as scheduled

Other: [insert reason—be specific and brief: also, insert specific violation of lease and/or tenant responsibility agreement here]

As a result of this termination your current balance due to the Community Action’s PSH programs program is $\_\_\_\_\_\_\_\_, in addition to any other charges (example: damages and/or security deposit) incurred after this date.

You have the right to appeal this decision. Should you choose to appeal this decision, you must follow the DestinationHOME Appeals Process (on the reverse side of this notice). Address the written appeal within 10 working days from the date of this letter to:

Community Action Commission of Fayette County  
Attn: Steve Creed  
1400 US Route 22 NW  
Washington Court House, OH 43160

A formal written response from this agency to your appeal must be made to you in writing within ten (10) working days from the date of receipt of your letter. During the appeal process your subsidy will be continued. If the appeal decision is not in your favor you will be responsible for repayment of any previous monies owed plus all monies incurred during the appeal process.

If you have any questions regarding this notification, please do not hesitate to call me at ###-####.

Sincerely,

[signed name and date]

[printed name, title]

cc: Landlord

## Sample Annual Re-Certification Notice

Date

Tenant Name

Tenant Address

Tenant Address

Dear Tenant:

The Community Action’s PSH programs Program (COMMUNITY ACTION’S PSH PROGRAMS) requires that all recipients of subsidy have their household certified for eligibility on an annual basis. We are required to verify relevant information so that tenant rents and assistance payments (if applicable) may be recomputed.

Your re-certification must be completed by the 10th of the month preceding your annual date. This means we must hear from you by \_\_\_\_\_\_\_\_\_\_\_\_\_. (Insert date)

To complete our review of your household income and family composition, you must supply me with the requested information checked below:

Receipts or stubs for employment, unemployment, social security, supplemental security income, alimony/child support payments, etc.

Information regarding savings and checking accounts, trusts, certificates of deposits, stocks/bonds, retirement/investment accounts, etc.

Please call me at (740) ###-#### to schedule an appointment as soon as possible. Failure to comply with this request may result in termination of your subsidy payments.

Sincerely,

Your name

Your Address

Cc: [applicable parties as permitted by releases of information]

## Sample 2nd Annual Certification Notice

Date

Tenant Name

Tenant Address

Tenant Address

Dear Tenant:

The Community Action’s PSH programs Program requires that all recipients of subsidy have their household certified for eligibility on an annual basis. We are required to verify relevant information so that tenant rents and assistance payments (if applicable) may be recomputed.

Your re-certification must be completed by the 10th of the month preceding your annual date. This means we must hear from you by \_\_\_\_\_\_\_\_\_\_\_\_\_. (Insert date)

If we do not hear from your by the date stated above we may stop your payments effective \_\_\_\_\_\_\_\_.(anniversary date)

To complete our review of your household income and family composition, you must supply me with the requested information checked below:

Receipts or stubs for employment, unemployment, social security, supplemental security income, alimony/child support payments, etc.

Information regarding savings and checking accounts, trusts, certificates of deposits, stocks/bonds, retirement/investment accounts, etc.

Please call me at (740) ###-#### to schedule an appointment as soon as possible. Failure to comply with this request may result in termination of your subsidy payments.

Sincerely,

Your name

Your Address

Cc: [applicable parties as permitted by releases of information]

## Sample 3rd Annual Certification Notice

Date

Tenant Name

Tenant Address

Tenant Address

Dear Tenant:

The Community Action’s PSH programs Program requires that all recipients of subsidy have their household certified for eligibility on an annual basis. We are required to verify relevant information so that tenant rents and assistance payments (if applicable) may be recomputed.

You have ten (10) days from the date of this letter to re-certify.

If we do not hear from your by the date stated above we may stop your payments or terminate you from the program effective \_\_\_\_\_\_\_\_.(anniversary date)

To complete our review of your household income and family composition, you must supply me with the requested information checked below:

Receipts or stubs for employment, unemployment, social security, supplemental security income, alimony/child support payments, etc.

Information regarding savings and checking accounts, trusts, certificates of deposits, stocks/bonds, retirement/investment accounts, etc.

Please call me at (207) ###-#### to schedule an appointment as soon as possible. Failure to comply with this request may result in termination of your subsidy payments.

Sincerely,

Your name

Your Address

Cc: [applicable parties as permitted by releases of information]

## Sample Move-Out Letter

Date

Address

Dear\_\_\_\_\_\_\_\_\_\_\_:

It has come to our attention that you are no longer living in the apartment we were subsidizing for you under the Community Action’s PSH programs Program. Since you left your apartment, you will need to contact \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ to remain eligible for Community Action’s PSH programs assistance. You will have 30 days from \_\_\_\_\_ , the date we became aware you left the unit, to contact us and find another apartment.

If we do not hear from you within 30-days, your Community Action’s PSH programs subsidy will be terminated on \_\_\_\_\_\_\_\_\_\_and you will have to reapply for the service in the future.

If the Security Deposit for \_\_\_\_\_\_\_\_\_\_\_\_ was retained by the landlord due to not giving 30 days notice, breaking the lease, damages, or unpaid rent, you will not be eligible for another Security Deposit.

Please call \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ your Destination Housing Specialist immediately, at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

Sincerely,

Housing Specialist

cc: caseworker

Enclosures: Appeals Procedure