

## 2017 Program Review and Certification Standards H. Housing

**New requirements are in red text and do not apply for the 2017 PR&C review. These requirements will be applicable in 2018.**

**Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2017 PR&C review.**

**Blue text describes how the revised 2017 standards correlate with the 2016 standards.**

Standard H1	Guideline H1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency participates in vacancy management with USHS. The agency has an active USHS MOU for each PSH project.	<input type="checkbox"/> The agency has a relationship with USHS for vacancy management. USHS prioritizes applicants for housing based on HUD Notice CPD-14-012.	<input type="checkbox"/> <b>Monitored through USHS</b>	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, USHS

Standard H2	Guideline H2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
All clients have formal lease agreements prior to receiving direct financial assistance.	<input type="checkbox"/> Agency staff can provide client files containing copies of legal leases / occupancy agreements. TRA leases are with CMHA client files if CMHA is processing monthly payments for landlords.  <input type="checkbox"/> <b>For PSH Leasing programs, the lease must be in the name of the agency and a sub-lease / occupancy</b>	<input type="checkbox"/> <b>File Review:</b> CSB reviewed client files for leases / occupancy agreements.  <input type="checkbox"/> <b>File Review: For PSH Leasing programs, CSB reviewed the Master Leases in each client file or a printout from the</b>	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs, <b>except Emergency Shelters</b>

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	<p style="color: red;">agreement must be executed with the client.</p> <ul style="list-style-type: none"> <li style="color: red;">☐ If applicable, the agency has documentation of a master lease or a printout from the property management system in the client file.</li> <li style="color: red;">☐ The minimum term of the lease / occupancy agreement is 6 months for Stable Families and ESG-funded RRH tenant-based Rental Assistance.</li> <li style="color: red;">☐ The minimum term of the lease / occupancy agreement is 12 months for ESG-funded RRH project-based Rental Assistance, CoC-funded Rental Assistance, CoC-funded Leasing, and HOME-funded Leasing.</li> <li style="color: red;">☐ The minimum term of the lease / occupancy agreement for Transitional Housing is 1 month.</li> <li style="color: red;">☐ The minimum term of the</li> </ul>	<p style="color: red;">agency's property management system for the selected clients.</p>				
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	<b>lease / occupancy agreement is 6 months for projects that are not funded with ESG, CoC, or HOME funds.</b>					
<b>Discussion and Basis for Conclusion</b>						

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

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	<p>recalculated. If applicable, a copy of the recertification completed by CMHA is included in the client file.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Acceptable income documentation includes pay stubs, earnings statements, W-2 forms, employer letters, documentation from the Social Security Administration or other public assistance agency, or a signed self-certification of zero income.</li> <li><input type="checkbox"/> Income documentation must be acquired, reviewed, and updated in the client file and CSP every year, within 30 days of the client's move-in date.</li> </ul>	<p>CSP (as part of the M standards review), and 3) use the income data in client files and CSP to confirm the calculation of occupancy fees.</p>				
<p><b>Discussion and Basis for Conclusion</b></p>						

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Standard H4	Guideline H4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Program participants meet the minimum eligibility criteria to receive financial assistance as detailed in the CSB HEARTH Operating Policies and Procedures.</p>	<p><input type="checkbox"/> Agency staff and records demonstrate that in order to receive financial assistance or services, individuals and families whether homeless or housed must at least meet the following criteria: (1) Any individual or family provided with financial assistance must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs. (2) The household must be at or below 35% of Area Median Income (AMI). (3) The household must be either homeless or at risk of losing its housing and meet both of the following circumstances: (a) no appropriate subsequent housing options have been identified and (b) the household lacks the financial resources and support networks needed to obtain</p>	<p><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files.</p>	<p><input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A</p>		<p align="center">1</p>	<p>All programs</p>

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	<p>immediate housing or remain in its existing housing.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> All client records must contain evidence of a CSB Client Eligibility Assessment form.</li> <li><input type="checkbox"/> All program records must meet the HUD Eligibility Determination and Documentation Requirements.</li> </ul>					
<b>Discussion and Basis for Conclusion</b>						

Standard H5	Guideline H5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The agency will recertify RRH clients every 12 months, as required by HUD, which includes the assurance that the household income is below 30% Area Median Income. The agency will track income at both entry and at 90-days and will</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Agency staff can explain the policy and procedures for client re-assessment.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	RRH/ Navigator

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provide a report when requested.						
<b>Discussion and Basis for Conclusion</b>						

Standard H6	Guideline H6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>The program complies with HUD CoC and ESG rent reasonableness and Fair Market Rent (FMR) requirements.</p> <p>Formerly standards H2 and H6.</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Agency staff can explain the policy and procedure to ensure rent reasonableness and FMR for units used to house clients.</li> <li><input type="checkbox"/> Rent reasonableness is determined for each unit by considering: 1) The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit; 2) The rent should not be in excess of rents currently being charged by the same</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <b>File Review: CSB reviewed client files for CoC-funded programs to confirm FMR and rent reasonableness.</b></li> <li><input type="checkbox"/> <b>File Review: CSB reviewed DCA files for RRH / Navigator clients.</b></li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	PSH, TH, RRH/ Navigator

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	<p>owner for comparable unassisted units. This comparison can include units advertised for rent as well those actual rents charged.</p> <p><input type="checkbox"/> Rent cannot exceed the FMR and must be within \$50 of the documented Rent Reasonableness Rate. If rent increases above the documented rent reasonableness rate, the rent reasonableness form must be updated to determine if rent remains reasonable.</p>					
<p><b>Discussion and Basis for Conclusion</b></p>						

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Standard H7	Guideline H7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<p>Disability-related supportive services are voluntary, except where required by HUD regulations, and tenants are not required to engage in disability-related supportive services as a condition of their tenancy, in accordance with Housing First principles. Participation in supportive services that are not disability-related may be required as a condition of the program. Participation may be required if clients are at or have been in imminent risk of eviction and services are necessary to maintain tenancy (e.g., protective payee). The program should not have sobriety requirements <b>unless authorized by the RLFC</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> The agency has a policy and a process for ensuring that all employees are educated regarding the policy.</li> <li><input type="checkbox"/> Files contain documentation demonstrating that disability-related supportive service participation is voluntary.</li> <li><input type="checkbox"/> Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication (as provided to a person with a disability to address a condition caused by that disability).</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> <u>File Review</u>: CSB reviewed client files.</li> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the policy.</li> <li><input type="checkbox"/> <u>Discussion</u>: CSB discussed with agency staff the process for ensuring that all employees are educated regarding the voluntary disability-related supportive services policy.</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul>		1	PSH, TH, RRH/ Navigator

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and HUD.					
<b>Discussion and Basis for Conclusion</b>					

Standard H8	Guideline H8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The Eligibility and Prioritization Form and eligibility documentation are signed by the appropriate agency staff and are kept in the client file.	<input type="checkbox"/> Client files contain signed Eligibility and Prioritization Form and eligibility documentation meets requirements.  <input type="checkbox"/> Documentation verifying history of homelessness and homelessness at point of entry is in the client file.  <input type="checkbox"/> Documentation includes a CSP/HMIS printout or an approved homeless outreach provider Verification of Street Homelessness forms.	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files to confirm eligibility documentation.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	PSH, USHS

<b>Discussion and Basis for Conclusion</b>						
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Standard H9	Guideline H9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
A client can be relocated temporarily, but only if they can be offered a decent, safe and sanitary unit in the same building or complex upon project completion, or, for scattered sites programs, a comparable unit in the same geographic area. The agency maintains records on any displaced clients. The agency gives permanently displaced clients advisory services specified by the Fair Housing Act.	<input type="checkbox"/> The agency must have a written policy on displaced clients. The agency must provide reasonable advanced written notice and must pay for the cost of moving and any increase in rent / occupancy charges / utilities.  <input type="checkbox"/> Any client temporarily relocated for more than 1 year is considered permanently displaced and must be offered relocation assistance and payments.  <input type="checkbox"/> Records on displaced clients must include race, ethnicity, gender, and addresses of where the clients relocated. Information on displaced clients must be documented in CSP/HMIS.  <input type="checkbox"/> <b>Clients who are displaced through no fault of their own must be provided a safe, sanitary, comparable unit. A client should be offered up to</b>	<input type="checkbox"/> <u>File Review</u> : CSB reviewed files of displaced clients, if applicable.  <input type="checkbox"/> <u>Policy Review</u> : CSB reviewed the policy.	<input type="checkbox"/> Compliant  <input type="checkbox"/> Compliant with conditions  <input type="checkbox"/> Non-compliant  <input type="checkbox"/> N/A		1	PSH, USHS, TH

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	<p>two comparable units.</p> <p><input type="checkbox"/> Displaced clients must retain access to similar services after relocation.</p>					
<p>Discussion and Basis for Conclusion</p>						

- \* CSB staff signature for Tier 1 (annually) and Tier 2 (every 4 years)
- \* Agency staff signature for Tier 2 (when not reviewed by CSB) and Tier 3 (annually)

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

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