

Program Review and Certification Standards

H. Housing

Standard H1	Guideline H1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency participates in vacancy management with USHS, in accordance with HUD Notice CPD-16-11.	<input type="checkbox"/> The agency has a relationship with USHS to manage vacancy management. <input type="checkbox"/> USHS uses the order of priority documented in the USHS Narrative Manual and Policies and Procedures.	<input type="checkbox"/> CSB discussed with agency staff the procedure for participation in vacancy management with USHS and reviewed policy. <input type="checkbox"/> CSB reviewed client files for evidence of USHS participation.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, USHS
Discussion and Basis for Conclusion The Guideline for this standard has been revised.						
Standard H2	Guideline H2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
All clients have formal lease agreements prior to receiving direct financial assistance. PSH leasing programs have leases in the name of the partner	<input type="checkbox"/> Agency staff can provide client files for inspection containing copies of legal leases. (TRA leases are with CMHA client files if CMHA is the grantee.)	<input type="checkbox"/> CSB reviewed leases and rent reasonableness forms. <input type="checkbox"/> CSB confirmed in conjunction with	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-		1	All programs

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<p>agency and a sub-lease/occupancy agreement with the client.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> If direct financial assistance is provided through federal funding (including ESG), the agency will be notified and the lease agreement must be executed prior to receiving the assistance, in accordance with federal funding guidelines. <input type="checkbox"/> DCA funds may only be spent on behalf of program participants where there is a legal lease that includes the participant's name on the document. <input type="checkbox"/> For PSH Leasing programs, the lease must be in the name of the agency and a sub-lease / occupancy agreement must be executed with the client. <input type="checkbox"/> Rent cannot exceed the Fair Market Rent or the documented Rent Reasonableness Rate. If rent increases above the rent reasonableness rate, an updated rent reasonableness form must be placed in the 	<p>Standard H6.</p>	<p>compliant</p> <p><input type="checkbox"/> N/A</p>		
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	client file.					
Discussion and Basis for Conclusion						

Standard H3	Guideline H3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program has documentation of how tenant rent is calculated annually. Rent may not exceed the highest of 10% of Annual Gross Income, 30% of Adjusted Gross Income, or, if applicable, the portion of public welfare assistance specifically designated for housing costs, whichever is greater, and provide assistance to assure tenants can meet rent requirements. CSB may waive this requirement for some units upon	<input type="checkbox"/> Residents are expected, but may not be required, to pay rent for their units. Residents with a cash income and a Section 8 voucher are required to pay rent. <input type="checkbox"/> 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"/> The income of each tenant	<input type="checkbox"/> CSB reviewed client files. <input type="checkbox"/> CSB reviewed tenant rent calculation. <input type="checkbox"/> CSB confirmed annual income verification.	<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>written agreement with the agency.</p>	<p>must be recorded and verified at the time of admission into housing.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Agency staff should verify income for each tenant at least annually, including obtaining proper income documentation for the client file. Agency staff will make appropriate adjustments to the tenant portion of the rent when new income information is verified. <input type="checkbox"/> The agency can show documentation of tenant rent calculations, including how frequently rent is recalculated. <input type="checkbox"/> The agency can demonstrate an approach (i.e., work equity) to assist tenants who are unable to pay rent. Such assistance may be time limited. <input type="checkbox"/> Agencies can demonstrate that staff develops and implements payment plans for rent arrearages, as 					
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	needed.					
Discussion and Basis for Conclusion New monitoring methods have been added to this standard.						

Standard H4	Guideline H4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
All program participants meet the minimum eligibility criteria to receive financial assistance as detailed in the CSB HEARTH Operating Policies and Procedures.	<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	<input type="checkbox"/> CSB reviewed client files.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs

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	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 immediate housing or remain in its existing housing. All client records must contain evidence of a CSB Client Eligibility Assessment form. All program records must meet the HUD Eligibility Determination and Documentation Requirements.					
Discussion and Basis for Conclusion						
Standard H5	Guideline H5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency will recertify rapid re-housing clients every 12-month as required by HUD, which includes the assurance	<input type="checkbox"/> Agency staff can explain the policy and procedures for client re-assessment.	<input type="checkbox"/> CSB reviewed client files and confirmed clients' recertification, as applicable.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions		1	RRH/ Navigator

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that the household income is below 30% Area Median Income. The agency will track income at both entry and at 90-days and will provide a report when requested.			<input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A			
Discussion and Basis for Conclusion						

Standard H6	Guideline H6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The program complies with HUD CoC and ESG rent reasonableness requirements. All programs receiving funds from HUD must adhere to rent reasonableness standards to determine whether a specific unit can be assisted. The rent reasonableness form should consider three units. A utility	<input type="checkbox"/> Agency staff can explain the policy and procedure to ensure rent reasonableness for units used to house clients. <input type="checkbox"/> A trained inspector will perform rent reasonableness assessments. <input type="checkbox"/> Rent reasonableness is determined on a case-by-case basis.	<input type="checkbox"/> CSB reviewed DCA files. <input type="checkbox"/> Confirmed in conjunction with Standard H2.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, TH , RRH/Navigator

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<p>allowance should be added to the proposed rent for any utilities not paid for by the landlord. The utility allowance is also applicable to the comparable units, if not included by the landlord. If the client is eligible for a one bedroom unit, the three comparable units and the utility allowances should all be for a one bedroom unit. Current utility allowances and FMRs should be used on the rent reasonableness form. The proposed rent (including utility allowances, if applicable) must be within \$50 of the average comparable rents to be considered rent reasonable.</p>	<p><input type="checkbox"/> Rent reasonableness is determined by considering the following: (1) The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit; (2) The rent should not be in excess of rents currently being charged by the same owner for comparable unassisted units. This comparison can include units advertised for rent as well those actual rents charged.</p> <p><input type="checkbox"/> An annual rent reasonableness survey should be performed. In order to keep the administrative burden to a minimum, rent reasonableness documentation does not have to be collected for each individual unit. Rather, rent data may be collected</p>				
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	<p>at the neighborhood or community level, as long as the staff member making the determination verifies the documentation is appropriate for the proposed unit.</p> <p>□ Strategies for addressing special circumstances include (but are not limited to):</p> <ul style="list-style-type: none"> • If the gross rent is at or below both the FMR and the rent reasonableness standard for a unit of comparable size, type, location, amenities, etc., CoC Program funds may be used to pay up to the full amount of the contract rent for the unit. • If the gross rent for the unit is reasonable but exceeds the FMR, CoC Program recipients and 					
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	<p>subrecipients may use CoC Program leasing funds for a portion of the rent, not to exceed the FMR. Other resources may be used to pay the difference.</p> <ul style="list-style-type: none"> • If the gross rent for the unit exceeds the rent reasonableness standard, CoC Program recipients or subrecipients are prohibited from using CoC Program funds for any portion of the rent. 					
Discussion and Basis for Conclusion This standard was revised to include HUD CoC rent reasonableness requirements and to add TH programs.						

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Standard H7	Guideline H7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Disability-related supportive services are voluntary, except where required by HUD regulations, and tenants are not required to engage in disability-related supportive services as a condition of their tenancy, in accordance with the Housing First Model. The program serves only persons who are homeless at time of admission. 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	<input type="checkbox"/> The agency has a policy and a process for ensuring that all employees are educated regarding the policy. <input type="checkbox"/> Files contain documentation demonstrating that disability-related supportive service participation is voluntary. <input type="checkbox"/> Examples of disability-related services include, but are not limited to, mental health services, outpatient health services, and provision of medication (as provided to a person with a disability to address a condition caused by that disability). <input type="checkbox"/> Files contain documentation demonstrating that the person(s) is homeless at time of admission.	<input type="checkbox"/> CSB discussed with agency staff the process for ensuring that all employees are educated regarding the voluntary Disability-related supportive services policy and reviewed the written policy. <input type="checkbox"/> CSB reviewed client files and confirmed the eligibility documentation.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, TH, RRH/Navigator

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have sobriety requirements unless it can demonstrate sound programmatic and/or sound clinical reasons for the requirement.						
Discussion and Basis for Conclusion						

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 USHS 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"/> CSB reviewed client files. <input type="checkbox"/> CSB confirmed the 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
Discussion and Basis for Conclusion						

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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 reimburse temporarily displaced clients 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"/> CSB reviewed the policy and reviewed the files of displaced clients, if applicable.	<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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	<input type="checkbox"/> Advisory services for permanently displaced clients under the Fair Housing Act include information on clients' rights to relocate to housing in areas of non-minority concentrations and referrals for minority persons to suitable decent, safe, sanitary housing not located in areas of minority concentration.					
Discussion and Basis for Conclusion This is a new standard.						

* CSB staff initials for Tier 1 and Tier 2

*Agency staff signature for Tier 3 and Voluntary

CSB certifying official signature

Date

CSB certifying official legibly printed name

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