

## F.5/D.5

### Adherence to Housing First Principles in Admitting and Terminating Participants

#### I. Admissions to Housing

In screening individuals and families for admission to housing projects, both the Homeless Navigation Hotline (the Hotline) and CoC- and ESG-funded housing projects will adhere to Housing First principles. Among other things, these principles prohibit screening out prospective participants based on any of the following:

- A. Having no income or too little income;
- B. Having a poor credit or financial history;
- C. Having a history of evictions from housing;
- D. Exhibiting behaviors that indicate a lack of “housing readiness”;
- E. Having an active substance use disorder or a history of such disorders;
- F. Having a criminal record, unless that record includes one or more convictions for crimes which result in state- or federally-mandated restrictions on housing;
- G. Refusing, in the case of permanent supportive housing, to accept or participate in treatment or supportive services; or
- H. Being a domestic violence victim, whether or not:
  - 1. The domestic violence has resulted in the involvement of law enforcement;
  - 2. The prospective participant has a protective order; or
  - 3. The prospective participant is currently separated from the abuser.

#### II. Terminations from Housing

- A. Grounds for Termination. ESG- and CoC-funded projects providing permanent housing, including either permanent supportive housing or rapid re-housing projects, may not base decisions to terminate a participant from their projects on any of the following:
  - 1. The participant’s use of alcohol or drugs, in and of itself (without other lease violations);
  - 2. The participant’s engagement in services, although rapid re-housing projects may require clients to accept case management as a condition to receiving rental assistance;

3. The participant's failure to make progress on a service plan;
  4. The participant's loss of income or failure to increase income; or
  5. The participant's engagement in any activities that are not commonly prohibited in other lease agreements found elsewhere in Stark County.
- B. Steps to be Taken Before Terminating a Participant. Before terminating a participant, providers of CoC- or ESG- funded housing must do the following:
1. Give the participant reasonable flexibility in paying their share of rent (after subsidy) and offer them special payment arrangements (*e.g.*, a payment plan) for rent arrears and/or assistance with financial management (including representative payee arrangements).
  2. Exercise judgment and examine all extenuating circumstances to ensure that the participant is terminated only in the most severe cases; and
  3. Follow formal policies and procedures for terminating assistance, which provide due process to the client as required by 24 CFR section 578.91.

### **III. Filing Complaints for Violations of These Rules**

Any person or any authorized agent of a person who believes that the person has been denied admission to or been terminated from permanent housing in violation of these rules, may file a complaint with the Collaborative Applicant by following the appeal procedures outlined in Section VII of the HCCSC's *Coordinated Entry Guide*.