

**Homeless Continuum of Care of Stark County (HCCSC)
Ohio Housing Finance Agency (OHFA) and
Ohio Department of Mental Health and Addiction Services (OMHAS)
Policies Governing Eligibility, Prioritization to Receive Assistance & Standards for Administering
Assistance, and Standards for Sub-Recipient Recordkeeping Requirements**

Purpose: OHFA and OMHAS are partnering together to supplement local Homeless Prevention and Emergency Rental Assistance efforts for those with a criminal justice history. These efforts may include assisting individuals leaving a correctional facility with a quarantine order to slow the transmission of COVID-19 and to prevent evictions and/or housing loss due to a decline in income, wage reduction, job loss, health challenges, or similar circumstances. The Homeless Continuum of Care of Stark County (HCCSC) has established eligibility, eligible uses of funds, prioritization and recordkeeping policies for this one-time funding opportunity Grant agreements will begin on June 17, 2020 and will expire on June 30, 2021.

Section - I. Eligibility, Eligible Uses of Funds and Prioritization for OHFA / OMHAS Criminal Justice Housing Homeless Prevention Program

1. Eligibility for OHFA / OMHAS homeless prevention assistance. To be eligible for homeless prevention services operated by participating agencies, qualifying applicant or co-applicant must:
 - a) Be a resident of Stark County or have been a Stark County resident prior to incarceration;
 - b) Must have left a correctional facility within 180 days of seeking assistance (Prisons, county jails, halfway houses, and community based correctional facilities which are considered secure residential program that provides comprehensive programming for offenders on felony supervision);
 - c) Be ineligible for system diversion;
 - d) Meet Homeless Navigation Pre-Screen eligibility;
 - e) Be at imminent risk of homelessness¹ or at imminent risk of eviction².

2. Eligible uses for homelessness prevention OHFA / OMHAS cost³
 - a) Rental assistance payments (no more than 6 months of rental assistance, including arrears.)
 - b) Security deposits
 - c) Landlord verification services
 - d) Utility payments
 - e) Housing case management
 - f) Moving cost assistance

¹ An individual or family who:

(i) Has an annual income below 50% of median family income for the area; AND (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND (iii) Meets one of the following conditions: (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care; OR (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan.

² Individuals or families who are unable to pay their rent and are at imminent risk of eviction.

³ Recommended Uses for Homeless Prevention Rapid Rehousing OHFA OMHAS Costs for Homelessness Prevention Rapid Rehousing Programs based on guidance from the Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

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3. Prioritization for homeless prevention OHFA / OMHAS. The following rules will be followed in prioritizing households for homeless prevention services:
- a) Prioritization for households at imminent risk of homelessness. Households that are at imminent risk of homelessness will be prioritized before households that are at imminent risk of eviction.
 - b) Prioritization for household related hardship. Households that have a hardship claim due to a decline in income, wage reduction, job loss, health challenges, or similar circumstances will be prioritized before those that do not have a hardship claim.

Section - II. Eligibility, Eligible Uses of Funds and Prioritization for OHFA / OMHAS Criminal Justice Housing Rapid Rehousing Program

1. Eligibility for OHFA / OMHAS rapid rehousing assistance. To be eligible for rapid rehousing services operated by participating agencies, qualifying applicant or co-applicant must:
- a) Be a resident of Stark County or have been a Stark County resident prior to incarceration;
 - b) Must have left a correctional facility within 180 days of seeking assistance (Prisons, county jails, halfway houses, and community based correctional facilities which are considered secure residential program that provides comprehensive programming for offenders on felony supervision);
 - c) Be ineligible for system diversion;
 - d) Meet Homeless Navigation Pre-Screen eligibility, complete HMIS intake and SPDAT assessment process;
 - e) Be literally homeless, or who meet the criteria in paragraph (1) of the “homeless” definition in 24 CFR 576.2.
2. Eligible uses for rapid rehousing OHFA / OMHAS cost⁴
- a) Rental assistance payments (no more than 6 months of rental assistance, including arrears.)
 - b) Security deposits
 - c) Landlord verification services
 - d) Utility payments
 - e) Housing case management
 - f) Moving cost assistance
3. Prioritization for rapid rehousing OHFA / OMHAS. The following rules will be followed in prioritizing households for rapid rehousing services:
- a) Prioritization for household related hardship. Households that have a hardship claim due to a decline in income, wage reduction, job loss, health challenges, or similar circumstances will be prioritized before those that do not have a hardship claim.

⁴ Recommended Uses for Homeless Prevention Rapid Rehousing OHFA OMHAS Costs for Homelessness Prevention Rapid Rehousing Programs based on guidance from the Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

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**Section – III. Eligibility, Eligible Uses of Funds and Prioritization for OHFA / OMHAS Criminal Justice Housing
Emergency Rental Assistance (ERA) Program**

1. Eligibility for OHFA / OMHAS emergency rental assistance. To be eligible for emergency rental assistance services operated by participating agencies, qualifying applicant or co-applicant must:⁵
 - a. Be a resident of Stark County or was a Stark County resident prior to incarceration;
 - b. Must have left a correctional facility within 180 days of seeking assistance (Prisons, county jails, halfway houses, and community based correctional facilities which are considered secure residential program that provides comprehensive programming for offenders on felony supervision) or have a Health Department order for isolation and/or quarantine for individuals exiting correctional facilities;
 - c. Be ineligible for system diversion;
 - d. Meet Homeless Navigation Pre-Screen eligibility;
 - e. Be at imminent risk of eviction⁶

2. Eligible Uses for emergency rental assistance OHFA / OMHAS cost⁷
 - a) Rental assistance payments (no more than 6 months of rental assistance, including arrears)
 - b) Security deposit
 - c) Landlord verification services
 - d) Housing case management

3. Prioritization for emergency rental assistance. The following rules will be followed in prioritizing households for ERA services:
 - a) Prioritization for household related hardship Households that have a hardship claim due to a decline in income, wage reduction, job loss, health challenges, or similar circumstances will be prioritized before those that do not have a hardship claim.

⁵ Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

⁶ An individual or family who:

(i) Has an annual income below 50% of median family income for the area; AND (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND (iii) Meets one of the following conditions: (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care; OR (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan.

⁷ Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

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Section – IV. Eligible Uses and Prioritization for OHFA / OMHAS Criminal Justice Housing Hotel / Motel Assistance Program

1. Hotel / motel OHFA OMHAS assistance.⁸ To be eligible for hotel / motel assistance services operated by participating agencies, qualifying applicant or co-applicant must :
 - a) Be a resident of Stark County or have been a Stark County resident prior to incarceration;
 - b) Meet Homeless Navigation Pre-Screen eligibility;
 - c) Have a Health Department order for 14 days isolation and/or quarantine for individuals exiting correctional facilities
2. Eligible uses for hotel / motel assistance OHFA / OMHAS cost⁹
 - a) Hotel/motel assistance for a period of no more than 28 days for the purposes of enabling an exiting individual with quarantine order to socially isolate for at least 14 days following their release.
3. Prioritization for hotel / motel. The following rules will be followed in prioritizing households for hotel / motel services:
 - a) Prioritization for hotel / motel assistance. Assistance for households that are seeking hotel / motel assistance will be prioritized by the date of contact with Homeless Navigation.

Section - V. Recordkeeping Requirements for OHFA and OMHAS Criminal Justice Housing Program Grant Program Sub-grantee Projects

- A. In general. Every sub-grantee of OHFA / OMHAS grant funds must establish and maintain standard operating procedures for ensuring that those funds are used in accordance with the requirements of the OHFA / OMHAS Criminal Justice Housing Program Grant Program and the HCCSC’s Ohio Housing Finance Agency and Ohio Department of Mental Health and Addiction Services Policies Governing Eligibility and Prioritization to Receive Assistance & Standards for Administering Assistance. Sub-grantees must maintain sufficient records and enable the OHFA / OMHAS Grantor, Stark Housing Network, Inc. (SHNI), access to these records.
 1. Records, access, and maintenance
 - i. Sub-grantee must:
 - a. Establish and maintain for at least three (3) years from the expiration or termination of grant agreement such records as are required by Grantor, including but not limited to, financial reports, intake and participant information, and all other relevant information.
 - b. Provide records required by Grantor with respect to any questioned costs, audit disallowances, litigation or dispute between Grantor and Sub-grantee shall be maintained for the time needed for the resolution of said question and that in the event of early termination of the grant agreement, or if for any other reason Grantor shall require a review of the records related to the Project, Sub-grantee shall, at its own cost and expense, segregate all such records related to the Project from its other records of operation.

⁸ Recommended Uses for Hotel / Motel OHFA OMHAS Costs for Homelessness Prevention Rapid Rehousing Programs based on guidance from the Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

⁹ Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

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- c. Provide an updated OHFA Emergency Housing Assistance Grant Tracking Report Template to the SHNI on a monthly basis, starting one month after receipt of funding. Reporting will continue to be due on the 15th of every month until the month following the exhaustion of funds.
 - d. Provide reports from Homeless Management Information System (HMIS) data input to the OHFA Emergency Housing Assistance Grant Tracking Report Template, including information about recipients, i.e. date of birth, age, race, ethnicity, income, geographic origination information, family status, members in household, etc. Data should be anonymized and de-identified prior to reporting through the use of a hashing process. The hashing process will provide a unique identifier in lieu of personal identifying information.
 - e. In the event of Unusual Circumstances Affecting Performance that the Sub-grantee cannot meet any or all of the obligations placed upon it by the terms of the grant agreement the Sub-grantee shall immediately notify Grantor (SHNI) in writing.
 - f. Submit to Grantor a Final Performance Report within 60 days of the end of the term of the grant agreement. This status report should be accompanied by details of individuals assisted, from HMIS system, OHFA COVID-19 Emergency Housing Assistance Grant Tracking Report Template and any other systems that are used for reporting and tracking grant relevant information.
2. Standard sub-grantee OHFA/ OMHAS operating procedure policies
- i. Sub-grantee must abide by the following operating policies:
 - a. Acceptance into OHFA / OMHAS project. Projects will accept referrals from Coordinated Entry and verify applicant eligibility.
 - b. Intake process. Sub-grantee will complete the intake process including Fair Market Rent calculation, any forms that may be utilized (ex. zero-income self-certification), and if applicable, participant verification of receipt of any agency project guidelines and/or policies (ex. receipt of HMIS Release of Information and Cause for Termination Statement).
 - c. OHFA Assistance Calculation. Sub-grantees will abide by a universal procedure established to determine the amount of assistance that the project will provide to participants including how much rental assistance will be provided and the length of assistance, based on the individualized assessment of the participant and potential negotiations with the landlord. Procedures must align with the Homeless Continuum of Care of Stark County (HCCSC) Ohio Housing Finance Agency (OHFA) / OMHAS Criminal Justice Housing Program Guidelines Policies Governing Eligibility and Prioritization to Receive CoC Assistance and Standards for Administering Assistance.
 - d. Tracking OHFA Participants Assistance. Sub-grantee must track assistance and funds provided to participants via the Homeless Management Information System (HMIS) for the OHFA Emergency Housing Assistance Grant Tracking Report Template.

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- e. Prioritization of eligible OHFA / OMHAS participants. Agencies will take referrals from the Prioritization List. Agencies will document updates to the list in a timely manner.
- f. Participant file confidentiality. Sub-recipient will follow the HCCSC's System Privacy & Security Policies.
- g. Participant termination. Sub-grantee's may terminate a participant from the program under the following circumstances:
 - i. Fraud
 - ii. Failure to report income within the specified timeframe (ten days)
 - iii. Failure to make contact with sub-grantee for thirty (30) days
 - iv. Violent or threatening behavior towards staff
 - v. Head of household has deceased and there is no co-applicant
 - vi. Failure to comply with established financial assistance plan

**Section – VI. Recordkeeping Requirements for OHFA / OMHAS Criminal Justice Housing Program -
Project Participant File Required Documents**

A. OHFA participant required documentation

Every sub-grantee of OHFA / OMHAS grant funds must establish and maintain eligibility documentation in a participant file to ensure that those funds are used in accordance with the requirements of the OHFA / OMHAS Criminal Justice Housing Program Grant Program and the HCCSC's Ohio Housing Finance Agency and Ohio Department of Mental Health and Addiction Services Policies Governing Eligibility and Prioritization to Receive Assistance & Standards for Administering Assistance.

- a. Identification. Participant acceptable identification documentation includes a driver's license, state identification card, or state issued identification document;
- b. HMIS release of information. The Participant Informed Consent and Release of Information Authorization form must be signed by each participant seen in person whose data is to be entered into the HMIS. Verbal consent must be obtained in situations where the Participant is not seen in person, such as telephone intakes, registrations, and assessments. Participant refusal to sign the consent or verbally agree to data sharing will prevent individual data from being shared. The non-identifying data will still be used in aggregate reports.
- c. Household composition. Household composition and family-status of all members in household must be included in file.
- d. Type and name of correctional facility the applicant or co-applicant was released from and their release date from the facility.
- e. Household demographics. Documentation including date of birth, age, race, ethnicity, income, geographic origination information for all household members must be included in HMIS.

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- f. Sub-grantees will document the agency’s attempts to contact applicants for assistance and document applicants’ failure to respond to the agency. Agencies have the ability to move on after two attempts within three business days from the first day on contact.

- g. Health and/or income hardship. Verification of a decline in wages, unemployment, or health impact acceptable documentation includes the following: participant pay-stubs backdating from the date requesting assistance; letter from employer; unemployment letter and/or verification that unemployment has been applied for; zero-income self-certification form signed by participant; self-statement of health challenges excluding diagnosis or similar circumstances.

- h. Fair Market Rent (FMR) Eligibility. Documentation for calculating rental payments which must not exceed 120% of the HUD Fair Market Rent (FMR) for the CoC service area.

- i. Imminent risk of homelessness or at imminent risk of eviction. Acceptable forms of documentation includes the following: a court ordered eviction notice; a notice from landlord to vacate the premises; signed statement from owner/tenant of location being asked to leave, including the date in which the participant is required to leave the premises; template letter signed and dated by the landlord/owner/tenant asking participant to vacate the premises; and in some cases a self-report with supporting documentation if released by an institutional setting (any health record documentation that includes a diagnosis or any medical information should be blacked-out or removed prior to placing documentation in file).