

**HOMELESS CONTINUUM OF CARE OF STARK  
COUNTY BOARD MEETING  
Tuesday, October 13, 2020  
at 9:30am Zoom Meeting  
Minutes**

**Members Present**

Danelle Lightner  
Lisa Warden  
Steve Inchak  
Rollin Seward  
Kim Kroh  
Julie Sparks  
Cathy Jennings  
Shannon McMahan Williams  
Shirene Starn-Tapyrik  
Beverly Lewis  
Marty Chumney  
Lynne Dragomier  
John Aller

**Members No Present**

Maria Heege  
Captain John Gabbard  
JoAnn Breedlove

**SHNI**

Marcie Bragg  
Melissa Terrell

**Guest**

Natalie McCleskey, ICAN Housing

**I. Welcome and Introductions**

At 9:32 a.m., Marcie Bragg, Board Chair, called the meeting to order and welcomed everyone to the Zoom meeting. Marcie welcomed guest Natalie McCleskey of ICAN Housing and thanked her for joining the Board meeting to discuss the Ohio Housing Finance Agency (OHFA) Ohio Department of Mental Health and Addiction Services (OMHAS) Criminal Justice Program policy. The OHFA/OMHAS Criminal Justice program provides assistance to individuals and/or families who have a head of household that was released from a correctional institution within a 180 days prior to seeking assistance; participants must be or have been a resident of Stark County prior to incarceration. Project components available under this opportunity are Rapid Rehousing (RRH), Homeless Prevention (HP), Emergency Rental Assistance (ERA), and in some cases, a hotel/motel stay for participants who have a Health Department order to self-quarantine. The Refuge of Hope will administer the OHFA/OMHAS funding opportunity. Marcie thanked Natalie for her work as a Coordinated Entry System Committee (CES) co-chair.

**II. Review and Approval of September 2020 Meeting Minutes**

Marcie opened discussion regarding the September Homeless Continuum of Care of Stark County (HCCSC) Board meeting minutes. A Board member recommended capitalizing Legal Aid where referenced in the minutes.

**Motion:** Marcie requested a motion to approve the September 2020 Homeless Continuum of Care of Stark County Board meeting minutes as amended. Kim Kroh motioned to approve. Rollin Seward seconded the motion and it was carried by all members present.

**III. Conflict Of Interest Policy**

Marcie distributed the conflict of interest policy agreement to Board members via email prior to the meeting. The conflict of interest policy agreement is required to be reviewed and signed by each Board member on an annual basis. Marcie requested that Board members sign the conflict of interest policy agreement and return to her by email or postal service to the Goodwill Community Campus.

**IV. Approval of the OHFA/OMHAS Criminal Justice Housing Program Policy (*See Attachment 1*)**

The OHFA/OMHAS Eligibility, Prioritization to Receive Assistance & Standards for Administering Assistance,

and Standards for Sub-Recipient Recordkeeping Requirements policy was distributed to Board members via email prior to the meeting and displayed during the Zoom meeting for Board members review. Natalie McCleskey led the Board members through the policy. Natalie indicated that a small group of people from the CES, Stark Housing Network, Inc., and Shannon McMahan Williams have been meeting to review funder requirements and create HCCSC policies. The small group drafted a policy that was uniform to the previously approved OHFA policies for HP and ERA in order to maintain consistent processes for seeking assistance. The small group recommended the OHFA/OMHAS policy to the CES for review and recommendation to the Board for approval. The OHFA/OMHAS funding opportunity provides assistance for individuals and/or families who have a head of household that was released from a correctional institution within a 180 days prior to seeking assistance. The funding opportunity offers assistance for RRH, HP, ERA, and in some cases, a hotel/motel stay for participants that have a Health Department order to self-quarantine for 14 days. This funding opportunity is set to expire on June 30, 2021. Natalie discussed each section of the policy with Board members and offered the following key points:

- 1) To receive assistance through the HP program, participants will not be required to complete a full Service Prioritization Decision Assessment Tool (SPDAT) assessment with Homeless Navigation; households will complete a Pre-Screen to determine possible eligibility for this project component.
- 2) Under the HP program, applicants are eligible if they are at-risk (meaning they lack a stable nighttime residence or may be in “doubled-up” situations) and imminent eviction (meaning the applicant is a current lease holder). Natalie expressed that prioritization studies show that “double-up” households are at a higher risk for entering into the homeless system.
- 3) Applicants that are literally homeless and seeking assistance will complete a full SPDAT to determine eligibility for the RRH program; any households that identify as literally homeless are required to complete a full SPDAT. The completion of the SPDAT will allow for literally homeless households to enter into emergency shelter and to determine possible eligibility for PSH and RRH projects.
- 4) Households that are seeking ERA assistance will not complete the full SPDAT; households will complete a Pre-Screen with Homeless Navigation to determine possible eligibility for this project component. This project component type is meant for households that are lease holders who are less likely to enter the homeless system.
- 5) Hotel/motel assistance is limited to individuals that are leaving a correctional institution with a Health Department order to self-quarantine for 14 days.
- 6) The recordkeeping sections of the policy mirror the previously approved OHFA policies for uniformity; this policy also includes the participant file documentation expectations.

**Discussion:** Natalie thanked HCCSC Board member Shannon for her work with the small group, Scott who is the CES co-chair and all of those involved in the policy creation process. Natalie will be participating in a Stepping-Up Committee and will share the OHFA/OMHAS information with that committee. This funding can be a resource for any applicant classified as a sex offender; this funding opportunity is able to provide assistance to a population that otherwise lacks resources in Stark County. There was also discussion that the correctional institutions should be made aware of this funding opportunity.

**Motion:** Marcie requested a motion to approve the Ohio Housing Finance Agency / Ohio Department of Mental Health and Addiction Services Criminal Justice Program Eligibility, Prioritization to Receive Assistance & Standards for Administering Assistance, and Standards for Sub-Recipient Recordkeeping Requirements policy. Julie Sparks motioned to approve. Cathy Jennings seconded the motion and it was carried by all members present.

#### **IV. Update on COVID-19 Homeless Task Force Activities**

The COVID-19 Homeless Task Force continues to meet every Tuesday morning. There is not a set agenda for the meetings; the meetings provide an opportunity for meeting participants to discuss any pressing issues and/or concerns and collaborate as a system in response to any topics posed by meeting participants. During the meeting today, meeting participants discussed access to flu shots and the emergency shelter waitlist. The Coalition on Homelessness and Housing in Ohio (COHHIO) – Housing Now for Homeless Families (HNHF) for Temporary

Assistance for Needy Families (TANF) eligible households' referral process, and referral sources, was also a topic of discussion. Lisa Warden, Canton City Schools Homeless Liaison, will work to connect families to this funding opportunity and will follow up with families that have been referred. The HNHF / TANF RRH program component is can provide up to four months of assistance and there was a discussion about utilizing this funding opportunity as a bridge into the Emergency Solutions Grant CARES Act (ESG-CV) RRH program to be able to offer additional resources to families with a greater need. Since the last Board meeting, there was a discussion between the homeless liaisons in the larger cities including Alliance, Canton, Massillon and Plain Local. Lisa Warden is working with the other school systems (or homeless liaisons) on strategies for academic success for those students who are experiencing barriers with remote learning..

**Discussion:** The Board discussed the schools plans for returning to in-person classes. Alliance schools will be returning to in-person classes five days a week with the option to continue in remote learning. Canton City schools is currently operating with students' in-person classes two days a week and remote learning for three days a week. Plain Local will return to in-person classes five days a week. ICAN Housing made an announcement that the agency is still performing street outreach and to contact ICAN Housing if there is anyone that is in need of assistance.

At the time of 10:07am, John Aller joined the meeting.

## **IX Old Business**

- a) Shannon McMahon Williams shared with the Board that an evaluation of Stark County's homeless prevention (HP) programs is being considered. The evaluation would focus on HP project implementation, processes and practices to ensure that projects are operating efficient, effective, and equitable programs. There has been a significant increase in the amount of funding for HP and the Department of Housing and Urban Development (HUD) has not provided much guidance on best practices for HP projects. This evaluation would provide an opportunity to learn how to best serve Stark County's participants. An independent evaluator has not been selected, but a proposal was requested. The proposal is from Barbara Poppe and Associates. Ms. Poppe was previously the chair of the United States Interagency Council on Homelessness (USICH) and worked with the Community Shelter Board and now has her own consulting agency. Shannon and Marcie will review proposals and have further discussions on next steps. Rollin Seward indicated that he has previously worked with Barbra and she would be an excellent candidate. Shannon also expressed that she worked with Barbra on the State Plan to End Homelessness.
- b) Cathy Jennings discussed the 15 Day Unity Challenge with Board members. Cathy reported that there was an overwhelming response to continue the conversation in the community and the YWCA, and partner agencies, will continue to hold discussions once a month over the next three months. Anyone interested in signing up for the Challenge can go to the YWCA's website and register; past participants will receive an email about the upcoming discussions.

## **X. New Business**

- a) The HCCSC Board members terms expiring at the end of the year will be discussed during the next HCCSC Members Meeting on November 16, 2020. Board members terms expiring in December are John Aller, Marty Chumney, Lynne Dragomier, Danelle Lightner, Shirene Starn-Tapyrik, and Julie Sparks. Marcie requested that Board members reach out to her with future plans of continuing as an HCCSC Board member. Marcie informed Board members that this will be the last Board meeting for John Aller. John is recommending that Allison Esber fill his position on the Board for the remainder of the year; Allison Esber is the System Initiative Manager for StarkMHAR and would be recommended for a three-year Board term at the end of the year. John commented on the progress of the HCCSC since the creation of the Stark Housing Network, Inc. (SHNI) stating that the HCCSC is in a significantly better position with the SHNI connecting with the HCCSC Board and Marcie's leadership. John also commented on Stark's COVID response as being stellar and that this response is being recognized at the State level. John thanked everyone for their hard work. Marcie thanked John for his time, commitment and support of the Board.
- b) Lynne Dragomier joined the Board when she was a part of Mercy Medical Center and has been a member

since 2005. This will be Lynne's last year as a Board member. Lynne stated that the HCCSC has great leadership and the Board has an increased confidence. Lynne also stated that the communication and work of providers is impressive and it is time for a new person to fill her position. Lynne encourage Board members to consider her replacement on the Board and to remember that she served as a hospital representative and as a community volunteer. John commented that Lynne is a committed volunteer of the Board and did much marketing on behalf of the Board to help make the Board successful. Marcie thanked Lynne for her time, commitment and support of the Board.

- c) Cathy Jennings also encouraged Board members to think about a possible replacement for her. Cathy is retiring from the YWCA and has accepted a new position. If her schedule allows, she would be willing to remain on the Board.

**Motion:** Marcie requested a motion to approve Allison Esber as a Homeless Continuum of Care of Stark County Board member to complete the remainder of John Aller's three year term ending in December 2020 and to approve the recommendation to include Allison on the 2021 Board slate of candidates for a three year term. Shirene Starn-Tapyrik motioned to approve. Beverly Lewis seconded the motion and it was carried by all members present.

**Discussion:** Marcie also discussed the Executive Committee's recommendation for revisions to the Governance Charter that outlines the Executive Committee structure. Revisions to the Governance Charter will be presented to the HCCSC Members during the November meeting. Due to John Aller's departure from the HCCSC Board and membership on the Executive Committee, the HCCSC Executive Committee will also have a vacancy that needs to be filled.

#### **XI. Adjournment**

With no further business to be discussed, at 10:27am the meeting adjourned.

**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**

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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 homelessness<sup>1</sup> or at imminent risk of eviction<sup>2</sup>.
  
2. Eligible uses for homelessness prevention OHFA / OMHAS cost<sup>3</sup>
  - 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

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<sup>1</sup> 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.

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

<sup>3</sup> 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

**Homeless Continuum of Care of Stark County (HCCSC)  
Ohio Housing Finance Agency (OHFA) and  
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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 cost<sup>4</sup>
  - 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.

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<sup>4</sup> 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:<sup>5</sup>
  - 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 eviction<sup>6</sup>
  
2. Eligible Uses for emergency rental assistance OHFA / OMHAS cost<sup>7</sup>
  - 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.

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<sup>5</sup> Ohio Housing Finance Agency OMHAS Criminal Justice Housing Program Guidelines

<sup>6</sup> 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.

<sup>7</sup> 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.<sup>8</sup> 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 cost<sup>9</sup>
  - 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.

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<sup>8</sup> 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

<sup>9</sup> 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).