

2025 Program Review and Certification Standards

A. Organizational Structure, Management, and Personnel

New requirements are in red text and do not apply for the 2025 PR&C review. These requirements will be applicable in 2026.

Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2025 PR&C review.

Bold are requirements that now apply for the 2025 PR&C review.

Standard A1	Guideline A1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
<u>Applicable Regulation(s): CoC CFR 578.75 (g)(1-2) eCFR :: 24 CFR 578.75 – General operations. ESG 24 CFR 576.405 eCFR :: 24 CFR Part 576 – Emergency Solutions Grants Program</u>						
<p>The agency includes at least one homeless or formerly homeless individual on the board of directors or other policy decision-making bodies.</p> <p>The agency board of directors is informed about the needs of homeless people at least annually if there is not a formerly homeless individual on the board of directors.</p>	<ul style="list-style-type: none"> The individual is identified by submitting to CSB the signed Participation of Homeless Individuals form. The individual actively participates in board or policy decision making body meetings, as documented by recent meetings minutes. Board minutes or other documentation from agencies that do not have a formerly homeless on the board of directors reflecting recent opportunities for board members to gather information about the homeless population. Examples documentation may include presentation of results from focus groups, arranging or participating in the annual Board2Board dialogue. 	<ul style="list-style-type: none"> <u>Other:</u> CSB reviewed the board or policy decision making body roster and recent minutes to ensure the individual attended board meetings within the review timeframe. CSB reviewed documentation that the board of directors was informed about the needs of homeless persons at least annually if there is not a formerly homeless individual on the board of directors. 	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		1	All programs except Prevention only programs

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Discussion and Basis for Conclusion

Standard A2	Guideline A2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation(s) CoC 24 CFR 578.95 eCFR :: 24 CFR 578.95 -- Conflicts of interest. ESG 24 CFR 576.404 eCFR :: 24 CFR 576.404 -- Conflicts of interest.						
The agency has a conflict of interest policy that includes prohibiting conflict of interest and nepotism for staff and volunteers.	<ul style="list-style-type: none"> The agency has a policy that indicates proper conduct and the prohibition of conflicts of interest and nepotism. The policy states that a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the subrecipient or contractor selected for an award. In such cases the policy states that the conflict must be disclosed, and the person must recuse themselves from any decision making in relationship with the specific subrecipient or contractor. 	<ul style="list-style-type: none"> <u>Policy Review</u>: CSB reviewed the agency's conflict of interest policy. <u>Policy Review</u>: CSB reviewed the agency's governance policy related to conflict of interest including the frequency by which the policy needs to be resigned. <u>Other</u>: CSB reviewed conflict of interest forms signed by staff and trustees. 	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		1	All programs

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	<p>The policy states that a conflict would arise when the provision or amount of assistance is conditioned on an individual's or family's acceptance of emergency shelter or housing owned by the recipient, subrecipient, or parent or subsidiary of the subrecipient, including Homelessness Prevention and Rapid Re-housing assistance.</p> <ul style="list-style-type: none"> • The policy prohibits officers, employees, and agents of the recipient soliciting, accepting gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. • The policy includes disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the recipient. 					
Discussion and Basis for Conclusion						

Standard A3	Guideline A3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: 24 CFR 5.109 eCFR :: 24 CFR 5.109 – Equal participation of faith-based organizations in HUD programs and activities.						

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The agency has a written policy that prohibits requiring, mandating, or improperly influencing religious participation as a prerequisite to receiving agency services.	<ul style="list-style-type: none"> The agency has a policy in place and a process for communicating the policy and educating staff and clients about the policy. If a client objects to the religious character of an agency that provides services, the agency must take reasonable efforts to refer the client to an alternative agency. 	<ul style="list-style-type: none"> <u>Policy Review</u>: CSB reviewed the policy and confirmed that there is a process for communicating to and educating staff and clients about the religious activities policy. <u>Discussion</u>: The agency described efforts to refer clients to alternate agencies when clients object to the religious character of the agency. 	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		2	All programs
Discussion and Basis for Conclusion						

Standard A4	Guideline A4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Title VI of the Civil Rights Act of 1964 Title VI of the Civil Rights Act of 1964 HUD.gov / U.S. Department of Housing and Urban Development (HUD) Fair Housing Laws Fair Housing and Related Law HUD.gov / U.S. Department of Housing and Urban Development (HUD) Disability Laws Disability Main HUD.gov						
The agency does not discriminate on the basis of race, religion, color, national origin, ancestry, sex, sexual orientation, gender identity, age, disability or other handicap, marital or familial	<ul style="list-style-type: none"> Policies are communicated and staff, trustees, volunteers, and clients are educated about nondiscrimination policies and procedures. 	<ul style="list-style-type: none"> <u>Policy Review</u>: CSB reviewed the policy and confirmed that a process is in place for communicating to and educating staff, trustees, volunteers, and clients about 	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant 		2	All programs

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<p>status, military status, status with regards to public assistance, or any other class of persons protected by applicable law. Agencies are prohibited from denying admission or terminating assistance based on a client being a victim or survivor of domestic violence, dating violence, sexual assault, or stalking. The agency has a written nondiscrimination policy applicable to staff, trustees, volunteers, and clients and there is evidence that it is being implemented. The agency operates in compliance with all applicable Equal Employment Opportunities and Affirmative Action requirements.</p>	<ul style="list-style-type: none"> • Policies are posted in areas where all staff, trustees, volunteers, and clients have access to them. • If the agency has multiple work sites, then the policy should be posted at each site where staff, trustees, volunteers, and clients congregate. • All individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, must be given access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation. Agencies must post HUD's Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's Community Planning and Development Programs. 	<p>nondiscrimination requirements, including Equal Employment Opportunities and Affirmative Action requirements.</p> <ul style="list-style-type: none"> • <u>Other:</u> CSB confirmed that policies were posted in areas where all staff, trustees, volunteers, and clients have access to them at each site. • <u>Other:</u> CSB confirmed posting of HUD's Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's Community Planning and Development Programs. • Fair Housing Poster 	<ul style="list-style-type: none"> • N/A 			
Discussion and Basis for Conclusion						

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Standard A5	Guideline A5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: PART 105-74—GOVERNMENTWIDE REQUIREMENTS FOR DRUG-FREE WORKPLACE (FINANCIAL ASSISTANCE) eCFR :: 41 CFR Part 105-74 -- Governmentwide Requirements for Drug-Free Workplace (Financial Assistance) (FMR Part 105-74)						
The agency has a Drug-Free Workplace Policy applicable to all staff and volunteers and posted in an area where everyone has access to it.	<ul style="list-style-type: none"> The agency has a process for communicating the policy and ensuring that all employees and volunteers are educated on the policy. The policy is posted in an area widely accessible to everyone. If the agency has multiple work sites, the policy is posted at each site. 	<ul style="list-style-type: none"> <u>Policy Review:</u> CSB reviewed the policy and ensured there is a process for communicating to and educating staff about the Drug-Free Workplace Policy. <u>Other:</u> CSB confirmed that policies were posted in areas where all staff and volunteers have access to them at each site. 	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		2	All programs
Discussion and Basis for Conclusion						

Standard A6	Guideline A6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: Ohio Revised Code Section 2923.125 Section 2923.125 - Ohio Revised Code Laws						
The agency has a policy regarding firearms and other weapons, as it	<ul style="list-style-type: none"> If the agency prohibits concealed weapons and 	<ul style="list-style-type: none"> <u>Policy Review:</u> CSB reviewed the policy 	<ul style="list-style-type: none"> Compliant 		2	All programs

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relates to employees, clients, and volunteers. The policy addresses the agency's stance on the concealed carry law and whether weapons, including firearms, are prohibited on the agency's premises or property including motor vehicles owned by the agency.	other weapons from the premises, appropriate signs are displayed and clients are informed of the policy upon admission.	and confirmed that there is a process in place for communicating the policy. <ul style="list-style-type: none"> • <u>Other</u>: CSB staff verified that a weapons policy is posted and in full view of entrants to the building(s). 	<ul style="list-style-type: none"> • Compliant with conditions • Non-compliant • N/A 			
Discussion and Basis for Conclusion						

Standard A7	Guideline A7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
HUD Guidance Emergency Response Plan Guidance Housing Counseling Disaster Recovery Toolkit						
The agency has a written disaster recovery and crisis communication plan that is reviewed, and updated if necessary, annually and distributed to appropriate employees.	<ul style="list-style-type: none"> • The plan should include, at a minimum, a definition of a disaster and/or crisis event; descriptions of actions taken following a disaster/crisis event; detailed contact lists of key personnel and external stakeholders; individual staff responsibilities; data back-up procedures; and methodologies used to update and distribute the plan. 	<ul style="list-style-type: none"> • <u>Policy Review</u>: CSB reviewed the plan. 	<ul style="list-style-type: none"> • Compliant • Compliant with conditions • Non-compliant • N/A 		2	All programs

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Standard A8	Guideline A8	Monitoring Method	C conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations: CoC 24 CFR 578.3 eCFR 24 CFR 578.3 - Definitions ESG 24 CFR 576.2						
The agency must be a nonprofit registered 501(c)3 or 501(c)4.	<ul style="list-style-type: none"> Up-to-date 501(c)3 or 501(c)4 documents are kept on file 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		3	All programs

Standard A9	Guideline A9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: HUD Guidance Sexual Harassment Resources HUD.gov / U.S. Department of Housing and Urban Development (HUD)						
The agency has a policy that prohibits sexual harassment which is applicable to staff, trustees, volunteers, vendors, and clients.	<ul style="list-style-type: none"> The agency has a process for communicating and educating staff, trustees, volunteers, vendors, and clients on the policy. 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions 		3	All programs

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			<ul style="list-style-type: none"> • Non-compliant • N/A 			
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Standard A10	Guideline A10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Staff receive training in the following areas: (1) Emergency evacuation procedures; (2) Universal Precautions; (3) CPR and First Aid; (4) Non-violent crisis intervention; (5) Ethical client practices; (6) Equity in action, including training specific to any target population(s) served; (7) Recognition and reporting of child and elder abuse; (8) Agency operating procedures; (9) Relevant community resources and social service programs;(CSB provides) (10) Customer service techniques; (11) Evidence-based practices relevant to	<ul style="list-style-type: none"> • The agency has a policy for ensuring that each new employee receives initial training within the first 6 months of employment or probationary/orientation period (whichever comes first) and that employees maintain certification where applicable. • If the training is not certified by an external body (e.g., first aid), employees should receive training at least once every two years. • The agency has a tracking system that identifies when each employee needs to receive training again and documentation of licensure for positions that require licensed or credentialed staff. • If serving youth, staff must be trained in Positive Youth Development. 	Self-certification	<ul style="list-style-type: none"> • Compliant • Compliant with conditions • Non-compliant • N/A 		3	All programs

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project type (optional and as needed) (12) Evidence-based practices relevant to population(s) served by the project. (optional and as needed) (13) Homeless Crisis Response System Overview (CSB will provide) (14) DV Trauma-Informed Care training (Mandatory within first six months for Homeless Hotline staff and DV RRH staff) (15) Trauma-Informed Care (CSB provides)						
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Standard A11	Guideline A11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has an organizational chart and written personnel policies detailing employee responsibilities, rights, roles, benefits, job description, attendance requirements, grievance procedures, hiring and termination procedures, annual employee review	<ul style="list-style-type: none"> The agency has a written personnel policy and procedure manual and a process for disseminating it to employees upon employment and when there are policy revisions. The manual is available for review and regularly updated. Agency has an organizational chart. 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		3	All programs

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protocol, hours of operation, confidentiality and the agency's compensation and benefits plan.						
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Standard A12	Guideline A12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Staff attends applicable system and partner meetings, trainings, and capacity building activities.	<ul style="list-style-type: none"> Staff attends meetings convened by CSB. Examples of meetings include Adult System Operations Workgroup, Family System Operations Workgroup, Permanent Supportive Housing Roundtable, Veteran System Operation Workgroup, YHDP partner meetings, Prevention Operations Workgroup, HMIS Administrators Group, coordinated planning activities, and focus groups. 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		3	All programs

Standard A13	Guideline A13	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
All staff and volunteers are identifiable to clients and visitors.	<ul style="list-style-type: none"> Easy identification can be achieved by staff nametags, shirts, or uniforms. 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant 		3	All programs

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			<ul style="list-style-type: none"> N/A 			
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Standard A14	Guideline A14	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
24 CFR 576.500(x) eCFR :: 24 CFR 576.500 -- Recordkeeping and reporting requirements.						
The agency has written procedures to ensure the security, privacy, and confidentiality of records as required including: a. that all records containing personally identifying information of any individual or family who applies for and/or receives assistance were kept secure and confidential; b. the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter projects assisted.	<ul style="list-style-type: none"> The agency has written procedures for client confidentiality of records 	Self-certification	<ul style="list-style-type: none"> Compliant Compliant with conditions Non-compliant N/A 		3	All programs

CSB reviews Tier 1 standards annually and 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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