

2025 Program Review and Certification Standards

F. Client Rights

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 F1	Guideline F1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a written document outlining clients' rights posted in a visible and accessible location, read and otherwise made known to clients upon admission, with accommodation for literacy and language barriers. All clients receive a copy of the clients' rights document upon intake including instructions for grievances and appeals and identifies the agency clients' rights contact information . Rights include, but are not limited to: > Clients have the right to be treated with dignity and respect; > Clients have the right to physical privacy;	<input type="checkbox"/> A written clients' rights document is available for review and includes the rights listed in the Standard. The document provides the name, email address and contact number for the Client Rights Officer/contact for each program (contact number at minimum). <input type="checkbox"/> Staff can discuss how the agency ensures that clients' rights are not violated and the procedure for addressing violations or alleged violations of clients' rights. <input type="checkbox"/> The agency has a process for reading and making known clients' responsibilities and code of conduct. <input type="checkbox"/> The agency has a process for distributing and making known program rules,	<input type="checkbox"/> <u>Policy Review</u> : CSB reviewed the written clients' rights document. <input type="checkbox"/> <u>Discussion</u> : CSB discussed with agency staff. <input type="checkbox"/> <u>Other</u> : CSB visually confirmed posting of clients' rights document in an area accessible to clients.	<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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<p>> Clients have the right to be treated with cultural sensitivity;</p> <p>> Clients have the right to self-determination in identifying and setting goals without preconditions on housing assistance;</p> <p>> Clients are clearly informed, in understandable language, about the purpose of the services being delivered, including clients who are not literate and/or are limited-English proficient;</p> <p>> Clients have the right to confidentiality and information about when confidential information will be disclosed, to whom and for what purpose, as well as the right to deny disclosure;</p> <p>> Clients have the right to reasonable access to records concerning their involvement in the program;</p> <p>> Clients have the right to have an advocate</p>	<p>regulations and termination policies.</p> <p><input type="checkbox"/> The code of conduct contains written guidelines of unacceptable participant behaviors that would lead to termination of services or program ineligibility. The consequences of rules violations are clearly stated and consistently enforced.</p>					
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present during appeals and grievance processes; > Clients have the right to choose their own housing or to reject substandard housing.						
Discussion and Basis for Conclusion						

Standard F2	Guideline F2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: 24 CFR 578.77(b) , 24 CFR 576.102 , & 576.104						
Agencies cannot deny service delivery because a client is unable to pay for the service.	<input type="checkbox"/> The program doesn't charge a program fee for program participation.	<input type="checkbox"/> <u>Policy Review</u> : CSB reviewed agency policy stating the program does not charge a program fee for participation.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	All programs
Discussion and Basis for Conclusion						

Standard F3	Guideline F3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
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Applicable Regulation: 24 CFR 578.7(a)(8) & 24 CFR 576.407(a)						
<p>The agency has a formal written grievance policy allowing client to file a complaint if they believe their rights have been violated or if they disagree with a decision made regarding their case. The policy should outline the steps for addressing concerns and seeking resolution and include an appeal process for clients that don't agree with the initial outcome of the grievance process.</p> <p>The program minimizes denials for reasons unrelated to program eligibility criteria. Service restrictions and appeals are reviewed at least annually by administrators or through a quality assurance process. The governing board (or its agent) evaluates all grievances to identify</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Grievance, appeal, and service restriction policies, as well as summaries of grievance and appeal reports, are available for review. <input type="checkbox"/> The program observes the following elements of due process: <ul style="list-style-type: none"> > An appeal/hearing before someone other than and not subordinate to the original decision maker, in which the client is given the opportunity to present written or oral objections to the decision; > Opportunity for the client to see and obtain evidence relied upon to make the decision and any other documents in the client's file prior to the hearing, including a written notice to the client containing a clear statement of the reasons for the decision; > Opportunity for the client to bring a representative of their choice to the hearing; > A prompt written final decision. <input type="checkbox"/> The agency gives clients a copy of the grievance form upon entry. The agency ensures that all 	<ul style="list-style-type: none"> <input type="checkbox"/> <u>Policy Review</u>: CSB reviewed policies and procedures. <input type="checkbox"/> <u>Discussion</u>: Agency staff explained the appeals process and provided examples of the process. <input type="checkbox"/> <u>Discussion</u>: Agency staff provided examples of trends identified and corrected through the grievance process. <input type="checkbox"/> <u>Other</u>: CSB reviewed annual grievance, appeal, and service restriction summaries. <input type="checkbox"/> <u>File Review</u>: Documentation of appeal decisions 	<ul style="list-style-type: none"> <input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A 		1	<p>All programs</p> <p>DCA appeals must go to Community Shelter Board if not resolved</p> <p>USHS appeals must go to Community Shelter Board if not resolved</p> <p>Development funded agencies must also ensure grievances and appeals comply with the Development standard.</p>

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<p>patterns and make corrections.</p>	<p>clients understand the grievance policy regardless of the clients' language or reading ability.</p> <ul style="list-style-type: none"> <input type="checkbox"/> When a service restriction is in effect, the client is informed of the reason, conditions for lifting the restriction, and right to appeal, including who to contact regarding an appeal and information about the appeal process. Staff can describe how any service restriction is compliant with the Homeless Crisis Response System (HCRS) Policies and Procedures (P&Ps*). <input type="checkbox"/> Shelter staff can demonstrate that clients have the opportunity to appeal discharge decisions prior to being asked to leave. This right is waived if a client poses a health or safety risk. Discharge procedures must be consistent with HCRS P&Ps*. <input type="checkbox"/> Clients are involved in monitoring summary information and trends related to grievances as part of the agency quality assurance / improvement practices. 	<p>and disposition prior to exit, except in Shelter when there is imminent health or safety concern.</p>				
<p>Discussion and Basis for Conclusion</p>						

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Standard F4	Guideline F4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations: eCFR :: 24 CFR 578.91 – Termination of assistance to program participants.						
<p>Programs must have a formal termination policy provided to program participants upon entry to the program that recognizes the rights of individuals affected and ensures that termination only occurs only in the most extreme cases. This policy must include:</p> <p>1) Written notice to the program participant containing a clear statement of the reasons for termination;</p> <p>2) A review of the decision, whereby the program participant is given the opportunity to appeal the decision; and</p> <p>3) Prompt written notice of the final decision to the program participant</p>	<p>The agency must provide the termination policy to program participants and document that it was provided to clients upon entry to the program. T</p> <p><input type="checkbox"/> Upon program enrollment, clients must sign an acknowledgment of termination and appeal procedures. Upon termination of housing and/or services, clients must receive written notice of termination and/or program exit. This does not pertain to a formal eviction process (noted below). Clients must receive written notice of appeal decisions, if Client files contain acknowledgement of written notice of termination of services.</p> <p><input type="checkbox"/> Should f clients exit prior to receiving written notice, t programs <u>must</u> document in client files multiple</p>	<p><input type="checkbox"/> <u>File Review:</u> CSB reviewed terminated and evicted client files.</p> <p><input type="checkbox"/> <u>Policy Review:</u> CSB reviewed termination and eviction policies and procedures.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		1	PSH, TH, RRH, Prevention

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	<p>attempts to provide them formal written notice of termination/exit and the right to appeal.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Programs must attempt to place terminated clients in alternate housing and not exit them back homelessness <input type="checkbox"/> Clients evicted from shelter can remain eligible for RRH services provided they were engaged in rapid rehousing prior to exit and continue to actively work with an RRH case manager in securing permanent housing Clients who decline a safe and appropriate housing option, may be exited from the RRH program. <input type="checkbox"/> RRH clients who are housed and become unhoused while active in the program must be exited and re-enrolled. <input type="checkbox"/> PSH clients who leave their original housing unit either by choice or due to an 					
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	<p>eviction may continue to be served in PSH if they have not been terminated and exited from the program, regardless of where they resided in the interim (e.g., in a motel/hotel or doubled-up with friends or family, shelter). There are no time limits to re-house the client if they are actively assisted in finding another unit.</p> <ul style="list-style-type: none"><input type="checkbox"/> For PSH and TH involving a standard lease, terminations from the program follow eviction procedures consistent with the Ohio Revised Code Chapter 5321 - Ohio Revised Code Ohio Laws and applicable Ohio Landlord-Tenant law.<input type="checkbox"/> PSH programs must submit a proposed eviction reporting form to the Community Shelter Board at least 14 days prior to filing with the court. This will give CSB and the PSH program an opportunity to problem solve the client					
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	specific situation and collectively seek potential alternative remedies.					
Discussion and Basis for Conclusion						

Standard F5	Guideline F5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations: Fair Housing Act , Title VI of the Civil Rights Act & 24 CFR 578.7(a)(8)						
The program ensures minority clients receive referrals to suitable decent, safe, sanitary housing not located in areas of minority concentration.	<input type="checkbox"/> Agency policy affirms this right and outlines procedures for referring minority clients to housing not located in areas of minority concentration, based on client choice. <input type="checkbox"/> CSB recommends that agency policy include content to this effect: “To the extent possible, [agency] attempts to identify and cultivate landlords for properties not located in areas of minority concentration so that clients can exercise choice regarding housing options.”	<input type="checkbox"/> <u>Policy Review:</u> CSB reviewed the policy.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH/USHS, TH, RRH
Discussion and Basis for Conclusion						

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Standard F6	Guideline F6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: HUD Guidance 42 US Code 11431						
Children and youth have access to public education and receive assistance exercising their rights as protected by the McKinney-Vento Homeless Assistance Act of 1987, as amended, Title VII, Subtitle B; 42 U.S.C. 11431. Heads of households are advised of their rights as they relate to the public education system.	<input type="checkbox"/> Staff can describe measures to ensure that clients' rights are not violated in relation to public education, including identification of and contact with the local Homeless Education Liaison serving the program's client population. <input type="checkbox"/> There is a process for advising clients of their rights as they relate to the public education system. <input type="checkbox"/> Examples of agencies working with the Homeless Education Liaison or other applicable staff to place children in public school, early childhood programs such as Head Start, Part C services in accordance with the Individuals with Disabilities Education Act, and/or other programs authorized under Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act of 1987 can be provided. <input type="checkbox"/> If a family with children is entering permanent housing, the agency	<input type="checkbox"/> <u>Policy Review:</u> CSB reviewed agency policy. <input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	All programs serving children and/or youth (0-24)

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	makes efforts to house the family as close as possible to its school of origin so as not to disrupt children's education.					
Discussion and Basis for Conclusion						

Standard F7	Guideline F7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Reference Material: DCA Appeal and USHS Appeal						
During the admissions process, applicants have the same due process rights as tenants.	<input type="checkbox"/> The program gives program applicants a copy of the clients' rights document, information about appeals, and admission decision with application materials.	<input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff how they ensured program applicants received relevant information.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		2	PSH, TH, RRH
Discussion and Basis for Conclusion						

Standard F8	Guideline F8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Clients are given the opportunity to be involved in program maintenance and provision of supportive services when applicable.	<input type="checkbox"/> To the maximum extent practicable, clients and others experiencing homelessness are involved, through employment, provision of volunteer services, or otherwise, in constructing, rehabilitating, maintaining, and operating facilities for the program and in providing	<input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff how clients are involved in program maintenance and provision of supportive services.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant		2	All programs

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	<p>supportive services.</p> <p><input type="checkbox"/> Expectations for clients during program participation are clear and emphasize contributions to the living environment and services.</p> <p><input type="checkbox"/> Examples include work equity programs and client opportunities to participate in chores and facility maintenance.</p>	<p><input type="checkbox"/> <u>Discussion</u>: CSB discussed client volunteer and work equity opportunities with agency staff.</p>	<p><input type="checkbox"/> N/A</p>			
Discussion and Basis for Conclusion						

Standard F9	Guideline F9	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Reference Material: CSB Legal Rights Brochure						
The agency distributes unbiased legal rights brochures to clients that cover topics such as landlord-tenant law, consumer protection, and other relevant topics.	<p><input type="checkbox"/> The agency can provide the brochures given to clients.</p>	<p><input type="checkbox"/> Other: CSB reviewed legal rights brochures provided to clients.</p>	<p><input type="checkbox"/> Compliant</p> <p><input type="checkbox"/> Compliant with conditions</p> <p><input type="checkbox"/> Non-compliant</p> <p><input type="checkbox"/> N/A</p>		2	All programs
Discussion and Basis for Conclusion						

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Standard F10	Guideline F10	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Reference Materials: Guide to Organizing and Running Resident Councils						
Clients are informed about and participate in a residents' council that meets at least quarterly.	<input type="checkbox"/> Staff assists with convening a residents' council or regular meeting of tenants for a particular project (single site or scattered sites). <input type="checkbox"/> Staff encourages tenants to participate in the council, which can address a variety of topics, including facility and program concerns. <input type="checkbox"/> Staff keeps notes from council meetings that are available for review.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	PSH TH

Standard F11	Guideline F11	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Clients are informed of CSB's Citizens Advisory Council (CAC) and the Youth Action Board (YAB, for youth aged 18-24) and encouraged to participate. Agencies work to ensure at least one resident per program participates	<input type="checkbox"/> Staff informs clients upon entry into the program that they are eligible to participate in the CAC and YAB, as applicable, and provides information regarding involvement. <input type="checkbox"/> The agency posts information on the CAC and YAB in single site supportive housing buildings and shelters.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs

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in monthly CAC and YAB meetings, as applicable.	<input type="checkbox"/> Staff periodically remind tenants about the CAC and YAB and encourage participation. <input type="checkbox"/> Staff assist clients with transportation to CAC and YAB meetings.					
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Standard F12	Guideline F12	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
The agency has a written policy, procedure and process for reporting child and elder abuse.	<input type="checkbox"/> The agency has a written policy and procedure for reporting abuse . <input type="checkbox"/> The agency disseminates the policy and procedure to all staff and ensures that agency staff is trained in the procedure. <input type="checkbox"/> Staff can describe how they ensure the policy and procedure is implemented and effective.	Self-certification	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		3	All programs

*Homeless Crisis Response System ([HCRS](#)) Policies & Procedures

CSB reviews Tier 1 standards annually and Tier 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.