

2025 Program Review and Certification Standards

H. Housing

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 H1	Guideline H1	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
CSB Guidance: USHS Vacancy Management Policy and Procedure						
The agency participates in vacancy management with USHS and has an active USHS MOU for each PSH project.	<input type="checkbox"/> Agencies with PSH programs collaborate with USHS for vacancy management. USHS prioritizes applicants for housing based on HUD Notice CPD-14-012. <input type="checkbox"/> Clients are offered up to two housing options. Housing must be decent, safe, and sanitary. If a client declines housing because it is not decent, safe, and sanitary or the housing and services offered with the housing do not meet the client's critical health and safety needs, it will not count as one of the client's two housing opportunities. The offers and reasons for declining must be documented in the client's file.	<input type="checkbox"/> Monitored through USHS <input type="checkbox"/> Denied USHS client correspondence is uploaded in HMIS	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH/USHS
Discussion and Basis for Conclusion						

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Standard H2	Guideline H2	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations & Training Materials: 24 CFR 576.106 , SNAPS-Shots ESG , 24 CFR 578.49 , CoC Virtual Binder , CoC at a Glance						
All clients have formal lease agreements prior to receiving rent and/or utility assistance through CSB.	<input type="checkbox"/> Staff can provide client files containing copies of legal leases / occupancy agreements. <input type="checkbox"/> For PSH rental assistance, CSB Housing Department maintains leases if CSB Housing Department is processing monthly payments for landlords. <input type="checkbox"/> For PSH leasing and sponsor-based rental assistance, the master lease must be in the name of the agency and a sub-lease / occupancy agreement must be executed with the client. <input type="checkbox"/> CoC programs cannot charge program fees to clients. If CoC clients are required to contribute towards rent, the lease must require the client to pay their rent contribution directly to the landlord/lessor.	<input type="checkbox"/> <u>File Review:</u> CSB reviewed client files for leases / occupancy agreements. <input type="checkbox"/> <u>File Review:</u> For CoC Leasing and sponsor-based Rental Assistance programs, CSB reviewed the master leases.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH, RRH, TH, and Prevention (only if client moves to a new unit)

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	<ul style="list-style-type: none"><input type="checkbox"/> PSH HOME units must be within the City of Columbus.<input type="checkbox"/> If a PSH qualifying participant dies, is incarcerated, or institutionalized for more than 90 days, the participant should be exited from the program. Program-assisted housing ends at lease expiration for any surviving/remaining members of the household.<input type="checkbox"/> The minimum term of the lease / occupancy agreement is 6 months for ESG and ODOD-funded RRH tenant-based rental assistance. The lease must be terminable for cause. CSB recommends the lease be automatically renewable upon expiration for at least 1 month, except on prior notice by either party.<input type="checkbox"/> The minimum term of the lease / occupancy agreement is 12 months for CoC-funded rental assistance, CoC-funded					
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	<p>leasing, and HOME-funded rental assistance; 1 month for YHDP RRH rental assistance and leasing; and 1 month not to exceed 24 months for TH. The lease / occupancy agreements for all programs except HOME, must be terminable for cause and automatically renew upon expiration for at least 1 month, except on prior notice by either party. For the HOME program, leases must be renewed in 12-month intervals.</p> <p><input type="checkbox"/> The minimum term of the lease / occupancy agreement is 6 months for projects that are not funded with ESG, CoC, or HOME funds. CSB may approve exceptions on a case-by-case basis.</p>					
<p>Discussion and Basis for Conclusion</p>						

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Standard H3	Guideline H3	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations & Training Materials: 24 CFR 578.77 , Virtual Binders , CoC at a Glance , Calculating Annual Income , HOTMA Fact Sheet						
The agency responsible for determining the client's portion of rent documents initial and annual tenant rent calculations. The tenant portion of rent and utilities should not exceed 30% of the monthly adjusted gross income, 10% of Annual Gross Income, or the portion of any public assistance designated for housing costs, whichever is greater.	<input type="checkbox"/> Residents are expected to pay rent for their units if they have income and a housing voucher or subsidy. <input type="checkbox"/> The agency has an income determination policy in alignment with the funding source to consistently and fairly determine updates to client's income. The policy must be easily explained and understood by participants and staff. Development funded transitional housing and permanent supportive housing programs require that household income is at or below 35 percent Area Median Income upon entry to the program. <input type="checkbox"/> The agency that determines the clients' rent must assess household income initially and at least annually, using the household's most recent income documentation, to	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files for tenant rent calculation and annual income verification. <input type="checkbox"/> <u>Policy Review</u> : CSB reviewed income determination policy	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH TH

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	<p>determine the tenant portion of the rent. Staff must make appropriate adjustments to the tenant portion of the rent when notified of household income changes.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The agency that determines the clients' rent can show documentation of tenant income and rent calculations at entry and recertification in the client file. <input type="checkbox"/> Acceptable income documentation includes pay stubs, earnings statements, W-2 forms, employer letters, documentation from the Social Security Administration or other public assistance agency, or a signed self-certification of zero income. <input type="checkbox"/> Per 24 CFR 576.500(e), 24 CFR 578.77(b)(2), & 24 CFR 92.203(d)(1) (ESG, CoC, and HOME respectively) funded projects must utilize 24 CFR 					
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	§5.609, which has been updated for HOTMA.					
Discussion and Basis for Conclusion						

Standard H4	Guideline H4	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: 24 CFR 576.401(b)						
The agency will recertify RRH clients every 12 months, as required by HUD, including documentation of household income below 30% Area Median Income or below 35% AMI for CoC-funded households.	<input type="checkbox"/> Staff can explain the procedures for client re-assessment. <input type="checkbox"/> CoC-funded households above 35% AMI and all other households above 30% AMI at the time of the annual reassessment must be exited from the program. <input type="checkbox"/> Households in CoC funded programs with income at the time of the annual reassessment <u>must</u> contribute 30% of their monthly adjusted income or 10% of their monthly gross income towards rent.	<input type="checkbox"/> <u>File Review</u> : CSB reviewed client files. <input type="checkbox"/> <u>Discussion</u> : CSB discussed client re-assessment processes.	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	RRH
Discussion and Basis for Conclusion						

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Standard H5	Guideline H5	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Training Materials: CoC/ESG Virtual Binder Rent Reasonableness & CoC/ESG Virtual Binder Fair Market Rent						
The program complies with HUD CoC and ESG rent reasonableness and Fair Market Rent (FMR) requirements.	<input type="checkbox"/> Staff can explain the procedure to ensure rent reasonableness and FMR compliance. <input type="checkbox"/> Rent costs must be sustainable for the client when assistance ends. <input type="checkbox"/> Rent reasonableness is determined for each unit by considering: 1) the reasonableness in relation to rents charged for comparable unassisted units, considering location, size, type, quality, amenities, management, and maintenance; 2) the rent should not exceed rents charged by the same owner for comparable unassisted units. This comparison can include units advertised for rent and the actual rents charged. All units must be within \$50 of the rent reasonableness rate. If rent or utilities increase, staff must update the rent	<input type="checkbox"/> <u>File Review:</u> CSB reviewed client and DCA files for CoC- and ESG-funded programs to confirm FMR, if applicable, and rent reasonableness compliance. <input type="checkbox"/> <u>Discussion:</u> Staff can explain how the agency complies with FMR and rent reasonableness requirements. <input type="checkbox"/> <u>Other:</u> During monthly invoice reviews, CSB compares HMIS rosters to HMIS client numbers provided on CoC invoices for programs that have Rental Assistance or Leasing Funds to make sure vacant	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	CoC/YHDP and ESG/ODSA funded PSH, TH, RRH

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	<p>reasonableness form to determine if rent remains reasonable.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Rent cannot exceed FMR for ESG-funded units. <input type="checkbox"/> Rent can exceed FMR for CoC-funded rental assistance units, or ESG-funded units receiving non-rent financial assistance only. <input type="checkbox"/> Rent can exceed FMR for CoC-funded leasing units, but CoC funds and match <u>cannot</u> be used to pay the portion of the rent over FMR. <input type="checkbox"/> For CoC-funded leasing units, the agency must use best and reasonable efforts to fill vacancies in an expeditious manner. <input type="checkbox"/> For CoC-funded rental assistance units, rent cannot be paid with federal funds for units that are vacant more than 30 days or for units leased without an eligible tenant assigned. 	units are filled quickly.				
Discussion and Basis for Conclusion						

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Standard H6	Guideline H6	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: CPD Notice 17-01						
The Eligibility and Prioritization Form and eligibility documentation are signed by the USHS manager and provided to the agency to be kept in the client file.	<input type="checkbox"/> Client files contain signed Eligibility and Prioritization Form and eligibility documentation meets requirements. <input type="checkbox"/> Documentation verifying history of homelessness and homelessness at entry is in the client file.	<input type="checkbox"/> Monitored through USHS	<input type="checkbox"/> Compliant <input type="checkbox"/> Compliant with conditions <input type="checkbox"/> Non-compliant <input type="checkbox"/> N/A		1	PSH/USHS
Discussion and Basis for Conclusion						

Standard H7	Guideline H7	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulation: 24 CFR 576.408 , 24 CFR 578.83						
A client can be relocated temporarily only if they can be offered a decent, safe, and sanitary unit in the same building or complex upon project completion,	<input type="checkbox"/> The agency must have a written policy on displaced clients. The agency must provide reasonable advanced written notice and must pay for the cost of moving and any increase in rent / occupancy charges / utilities.	<input type="checkbox"/> <u>File Review:</u> CSB reviewed files of displaced clients, if applicable. <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		1	PSH, USHS, TH CoC funded only

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<p>or, for scattered sites programs, a comparable unit in the same geographic area. The agency maintains records on displaced clients. The agency gives permanently displaced clients advisory services specified by the Fair Housing Act.</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Any client temporarily relocated for more than 1 year is considered permanently displaced and must be offered relocation assistance and payments. <input type="checkbox"/> Records on displaced clients must include race, ethnicity, gender, and addresses of where the clients relocated. Information on displaced clients must be documented in HMIS. <input type="checkbox"/> Clients who are displaced through no fault of their own must be provided a safe, sanitary, comparable unit. A client should be offered up to two comparable units. <input type="checkbox"/> Displaced clients must retain access to similar services after relocation. <input type="checkbox"/> Advisory services for permanently displaced clients under the Fair Housing Act include information on clients' rights to relocate to housing in areas of non-minority concentrations. 		<input type="checkbox"/> N/A			
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Discussion and Basis for Conclusion

Standard H8	Guideline H8	Monitoring Method	Conclusion	Certifying Official*	Tier	Program Type
Applicable Regulations: 2022 VAWA Reauthorization , Interagency Statement on VAWA Provisions , Letter to Continua of Care						
The program complies with the requirements of the Violence Against Women Act (VAWA).	<input type="checkbox"/> The VAWA Notice and Transfer Request Form must be given to clients at program admission or denial, and at eviction or termination. If clients voluntarily exit the program, client files contain notification of VAWA forms at exit. <input type="checkbox"/> Survivors of domestic violence, dating violence, sexual assault, or stalking can request an emergency transfer from the current unit to a new unit. <input type="checkbox"/> The agency must have a written emergency transfer plan. The plan must identify how tenants request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to	<input type="checkbox"/> <u>Discussion:</u> CSB and agency staff discussed the process for ensuring VAWA forms are given to clients and protections are included in leases or contracts. <input type="checkbox"/> <u>Policy Review:</u> CSB reviewed the system emergency transfer plan. <input type="checkbox"/> <u>File Review:</u> CSB reviewed VAWA lease/contract for protections and USHS denial correspondence .	<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

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	<p>tenants on safety and security.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Emergency transfer requests for permanent supportive housing are handled through USHS. <input type="checkbox"/> All leases or rental assistance contracts must include VAWA protections. Except for tenant-based rental assistance, this must include the right to break the lease without penalty if the tenant requests because of DV. <input type="checkbox"/> VAWA protections must be included in all rental agreements and housing assistance contracts between agencies and housing owners / landlords. 					
Discussion and Basis for Conclusion						

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.