

## 2023 Program Review and Certification Standards

### F. Client Rights

**New requirements are in red text and do not apply for the 2023 PR&C review. These requirements will be applicable in 2024.**

**Minor adjustments and clarifications and changes to Tiers are in green text. These changes are applicable for the 2023 PR&C review.**

**Bold are requirements that now apply for the 2023 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 officer. Rights include, but are not limited to:<br><ul style="list-style-type: none"> <li>&gt; Clients have the right to be treated with dignity and respect;</li> <li>&gt; Clients have the right to physical privacy;</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> A written clients' rights document is available for review and includes the rights listed in the Standard. <b>The document provides the name, email address and contact number for the Client Rights Officer/contact for each program.</b></li> <li><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.</li> <li><input type="checkbox"/> The agency has a process for reading and making known clients' responsibilities and code of conduct.</li> <li><input type="checkbox"/> The agency has a process for distributing and making known program rules,</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the written clients' rights document.</li> <li><input type="checkbox"/> <u>Discussion</u>: CSB discussed with agency staff.</li> <li><input type="checkbox"/> <u>Other</u>: CSB visually confirmed posting of clients' rights document in an area accessible to clients.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | 1    | All programs |

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| <ul style="list-style-type: none"> <li>&gt; Clients have the right to be treated with cultural sensitivity;</li> <li>&gt; Clients have the right to self-determination in identifying and setting goals <b>without preconditions on housing assistance</b>;</li> <li>&gt; 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;</li> <li>&gt; 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;</li> <li>&gt; Clients have the right to reasonable access to records concerning their</li> </ul> | <p>regulations and termination policies.</p> <ul style="list-style-type: none"> <li><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.</li> </ul> |  |  |  |  |  |
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| involvement in the program;<br>> Clients have the right to have an advocate present during appeals and grievance processes;<br>> Clients have the right to choose their own housing or to reject substandard housing. |  |  |  |  |  |  |
| <b>Discussion and Basis for Conclusion</b>  |  |  |  |  |  |  |

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

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| Standard F3   | Guideline F3  | Monitoring Method  | Conclusion   | Certifying Official* | Tier | Program Type |
|---|---|--|--|----------------------|------|--------------|
| <p>The agency has a grievance policy for addressing alleged violations of clients' rights. The agency has an appeals policy and follows appropriate due process when handling grievances and appeals and when deciding to restrict clients from services. 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 patterns and make corrections.</p> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Grievance, appeal, and service restriction policies, as well as summaries of grievance and appeal reports, are available for review.</li> <li><input type="checkbox"/> The program observes the following elements of due process:               <ul style="list-style-type: none"> <li>&gt; 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;</li> <li>&gt; 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;</li> <li>&gt; Opportunity for the client to bring a representative of their choice to the hearing;</li> </ul> </li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Policy Review:</u> CSB reviewed policies and procedures.</li> <li><input type="checkbox"/> <u>Discussion:</u> Agency staff explained the appeals process and provided examples of the process.</li> <li><input type="checkbox"/> <u>Discussion:</u> Agency staff provided examples of trends identified and corrected through the grievance process.</li> <li><input type="checkbox"/> <u>Other:</u> CSB reviewed annual grievance, appeal, and service restriction summaries.</li> <li><input type="checkbox"/> <u>File Review:</u> Documentation of appeal decisions and disposition prior</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | 1    | All programs |

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|  | <p>&gt; A prompt written final decision.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The agency gives clients a copy of the grievance form upon entry. The agency makes reasonable efforts to ensure that all clients understand the grievance policy regardless of the clients' language.</li> <li><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 (<a href="#">HCRS</a>) Policies and Procedures (P&amp;Ps*).</li> <li><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</li> </ul> | <p>to exit, except in Shelter when there is imminent health or safety concern.</p> |  |  |  |  |
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|  | <p>procedures must be consistent with <a href="#">HCRS</a> P&amp;Ps*.</p> <p><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> |  |  |  |  |  |
| <b>Discussion and Basis for Conclusion</b> |  |  |  |  |  |  |

| Standard F4   | Guideline F4  | Monitoring Method   | Conclusion  | Certifying Official* | Tier | Program Type             |
|---|---|---|---|----------------------|------|--------------------------|
| <p>The agency has a termination policy and practice of providing written plans for at-risk clients that include strategies for intervention, prevention, or housing retention that help clients avoid losing housing.</p> | <p><input type="checkbox"/> The agency can provide the termination policy and documentation that written plans were given to clients. The agency can give examples of clients who successfully and unsuccessfully appealed termination.</p> <p><input type="checkbox"/> Upon program enrollment, clients must sign an acknowledgment of termination and appeal procedures. Upon termination, clients must receive written</p> | <p><input type="checkbox"/> <u>File Review</u>: CSB reviewed terminated client files.</p> <p><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed termination 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>notice of termination. Clients must receive written notice of appeal decisions, if applicable. If clients disappear, programs <u>must</u> document in client files multiple attempts to contact them prior to termination <b>and confirmation that they were unable to provide a written notice of termination. If clients voluntarily exit the program, client files contain acknowledgement of written notice of termination of services.</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> The agency can demonstrate that staff develops and implements payment plans as needed.</li> <li><input type="checkbox"/> Clients who exit shelter remain eligible for RRH services. To remain eligible, clients need to be engaged and actively work with a RRH case manager prior to shelter exit, continue to engage with their case manager, and actively search for stable housing after exit. If a client declines a safe and appropriate housing option,</li> </ul> |  |  |  |  |  |
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|  | <p>they may be exited from the RRH program.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> RRH clients that are housed and become unhoused while active in the program must be exited and re-enrolled.</li> <li><input type="checkbox"/> The program provides a pre-termination hearing (discussion with the case manager or supervisor, offering an appeal if needed).</li> <li><input type="checkbox"/> For PSH and TH involving a standard lease, terminations from the program follow eviction procedures consistent with the Ohio Revised Code, applicable Ohio Landlord-Tenant law, and <a href="#">HCRS</a> P&amp;Ps*.</li> </ul> |  |  |  |  |  |
| <b>Discussion and Basis for Conclusion</b> |   |  |  |  |  |  |

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| Standard F5  | Guideline F5   | Monitoring Method   | Conclusion   | Certifying Official* | Tier | Program Type             |
|--|--|---|--|----------------------|------|--------------------------|
| <p>The program ensures minority clients receive referrals to suitable decent, safe, sanitary housing not located in areas of minority concentration.</p> | <ul style="list-style-type: none"> <li><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.</li> <br/> <li><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.”</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed the policy.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | 1    | <p>PSH/USHS, TH, RRH</p> |
| <p><b>Discussion and Basis for Conclusion</b></p>  |  |   |  |                      |      |                          |

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| Standard F6   | Guideline F6  | Monitoring Method  | Conclusion   | Certifying Official* | Tier | Program Type   |
|---|---|--|--|----------------------|------|--|
| <p>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.</p> | <ul style="list-style-type: none"> <li><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.</li> <li><input type="checkbox"/> There is a process for advising clients of their rights as they relate to the public education system.</li> <li><input type="checkbox"/> Client files include 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.</li> <li><input type="checkbox"/> If a family with children is entering permanent housing,</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> <u>Policy Review</u>: CSB reviewed agency policy.</li> <li><input type="checkbox"/> <u>Discussion</u>: CSB discussed with agency staff.</li> </ul> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | 2    | <p>All programs serving children and/or youth (0-24)</p> |

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

| <b>Standard F7</b>   | <b>Guideline F7</b>   | <b>Monitoring Method</b>   | <b>Conclusion</b>  | <b>Certifying Official*</b> | <b>Tier</b> | <b>Program Type</b> |
|--|---|--|--|-----------------------------|-------------|---------------------|
| 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<br><input type="checkbox"/> Compliant with conditions<br><input type="checkbox"/> Non-compliant<br><input type="checkbox"/> N/A |                             | 2           | PSH, TH, RRH        |
| <b>Discussion and Basis for Conclusion</b>   |   |  |  |                             |             |                     |

| <b>Standard F8</b>  | <b>Guideline F8</b>   | <b>Monitoring Method</b>  | <b>Conclusion</b>  | <b>Certifying Official*</b> | <b>Tier</b> | <b>Program Type</b> |
|---|---|---|--|-----------------------------|-------------|---------------------|
| Clients are 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 | <input type="checkbox"/> <u>Discussion:</u> CSB discussed with agency staff how clients are involved in program maintenance and | <input type="checkbox"/> Compliant<br><input type="checkbox"/> Compliant with conditions |                             | 2           | All programs        |

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|  | operating facilities for the program and in providing supportive services.  | provision of supportive services.   | <input type="checkbox"/> Non-compliant<br><br><input type="checkbox"/> N/A |  |  |  |
|  | <input type="checkbox"/> Expectations for clients during program participation are clear and emphasize positive contributions to the living environment and services. | <input type="checkbox"/> <u>Discussion:</u> CSB discussed client volunteer and work equity opportunities with agency staff. |  |  |  |  |
|  | <input type="checkbox"/> Examples include work equity programs and client responsibilities for chores and facility maintenance.                                       |   |  |  |  |  |
| <b>Discussion and Basis for Conclusion</b> |   |   |  |  |  |  |

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

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| Standard F10   | Guideline F10  | Monitoring Method         | Conclusion   | Certifying Official* | Tier     | Program Type                                  |
|--|--|---------------------------|--|----------------------|----------|---|
| <p>Clients are informed about and participate in a residents' council that meets at least quarterly.</p> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Staff assists with convening a residents' council or regular meeting of tenants for a particular project (single site or scattered sites).</li> <li><input type="checkbox"/> Staff encourages tenants to participate in the council, which can address a variety of topics, including facility and program concerns.</li> <li><input type="checkbox"/> Staff keeps notes from council meetings that are available for review.</li> </ul> | <p>Self-certification</p> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | <p>3</p> | <p>All programs where tenants sign leases</p> |

| Standard F11  | Guideline F11   | Monitoring Method         | Conclusion   | Certifying Official* | Tier     | Program Type        |
|---|---|---------------------------|--|----------------------|----------|---------------------|
| <p>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</p> | <ul style="list-style-type: none"> <li><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.</li> <li><input type="checkbox"/> The agency posts information on the CAC and YAB in single site supportive housing buildings and shelters.</li> </ul> | <p>Self-certification</p> | <ul style="list-style-type: none"> <li><input type="checkbox"/> Compliant</li> <li><input type="checkbox"/> Compliant with conditions</li> <li><input type="checkbox"/> Non-compliant</li> <li><input type="checkbox"/> N/A</li> </ul> |                      | <p>3</p> | <p>All programs</p> |

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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.<br><br><input type="checkbox"/> Staff assists clients with transportation to CAC and YAB meetings. |  |  |  |  |  |
|---|--|--|--|--|--|--|

| 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.<br><br><input type="checkbox"/> The agency disseminates the policy and procedure to all staff and ensures that agency staff is trained in the procedure.<br><br><input type="checkbox"/> Staff can describe how they ensure the policy and procedure is implemented and effective. | Self-certification | <input type="checkbox"/> Compliant<br><br><input type="checkbox"/> Compliant with conditions<br><br><input type="checkbox"/> Non-compliant<br><br><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.

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