

Cleveland/Cuyahoga County Continuum of Care (CoC)

Customized Services Requirement

1. Purpose

This policy establishes how homelessness assistance projects will meet requirements to provide customized services for all participants age 62 and under who are not disabled (as defined in 24 CFR 582.5, excluding SUD). The policy ensures services are individualized, accessible, and delivered through a mix of project-provided supports and formal partner services.

2. Policy

CoC-funded projects shall provide, directly or leveraged through community partners, customized supportive services for each participant under age 62 who does not have a qualifying disability under 24 CFR 582.5 (excluding substance use disorders). Project participants shall participate in supportive services, with exceptions made for qualifying disabilities and when work schedules conflict.

Services will be individually tailored, may include project-based, partner-delivered, or participant self-directed activities, and can be delivered on-site, off-site, and/or virtually. For employed participants, the weekly service hours may be prorated dependent on weekly employment obligations and schedules. The project maintains a weekly service availability schedule that meets or exceeds required thresholds and documents customization through the ISP and **Service Participation Agreement**. The project maintains documentation demonstrating the availability and customization of services for each participant.

See Guidance for Responding to Non-Compliance with Services if participant does not meet services requirement.

3. Definitions

Customized Services: A flexible bundle of project or partner provided services, support, and activities selected in collaboration with each participant, based on their goals, strengths, needs, and readiness. Customized services may include any combination of:

- **Case management:** service coordination, housing stability planning,
- **Counseling:** individual and family counseling
- **Employment and education services:** job readiness, training, or skill development
- **Life skills,** budgeting, nutrition, household management, language literacy
- **Housing skills:** tenancy skills, lease compliance and management
- **Physical health:** treatment to address physical health conditions
- **Mental health services:** including treatment to behavioral health conditions, arranged appointments, care coordination, wellness groups
- **Substance use disorder treatment or recovery support:** when appropriate and voluntary unless required by program design and compliant with 24 CFR 578.75(h)
- **Peer support:** mentoring, or recovery coaching
- **Benefits enrollment:** financial counseling, or income-support navigation
- **Community integration activities:** recreational or therapeutic programming, and faith-based or community based activities
- **Self-directed activities:** include online classes, job search activities, or community-based support group participation

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Proration of Hours for Employed Participants: The 40-hour requirement may be reduced proportionately for participants who are employed. The project will prorate hours based on weekly employment hours documented through paystubs or participant self-attestation.

4. Procedures

A. Eligibility Determination

1. At intake and during each re-assessment, staff determine whether the 40-hour customized services requirement applies.
2. Staff document employment status and weekly hours (if applicable).
3. Staff explain the service availability and participation expectations as part of the **Service Participation Agreement**.

B. Individualized Service Planning

1. Within **7 days of enrollment**, staff and the participant complete an **Individualized Service Plan (ISP)** or similar goal plan.
2. The ISP outlines:
 - Participant goals (housing stability, income/employment, health, etc.)
 - Service types selected by the participant
 - Preferred modalities (in-person, virtual, self-directed, etc.)
 - Weekly schedule reflecting up to 40 hours of options (or prorated hours for employed participants)
3. ISPs are updated regularly (e.g., quarterly or more frequently) based on participant needs and progress.

C. Documentation

1. A **Service Availability Log** is maintained in the participant file demonstrating 40 hours/week of services offered.
2. Individualized **ISP** documentation is maintained in the participant file showing how services are customized and available each week.
3. Service delivery is recorded in HMIS or an approved comparable database.
4. Partnership agreements and schedules are retained in program administration files for all external providers contributing to service availability.

D. Monitoring & Quality Assurance

1. Supervisors review ISP customization and service availability logs **monthly**.
2. The project ensures compliance with:
 - HUD CoC NOFO service requirements
 - 24 CFR 578.75(h) supportive service participation standards
3. **Corrective actions** are implemented when service hours fall below required thresholds or customization is not adequately demonstrated. See Guidance for **Responding to Non-Compliance with Services**.