



# **HOMELESS ASSISTANCE PROGRAM**

## **INSTRUCTIONS AND REQUIREMENTS**

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## **I. OVERVIEW**

### **A. INTRODUCTION**

The Homeless Assistance Program Instructions and Requirements (HAP I & R) manual provides operational guidance for the Pennsylvania Department of Human Services's (DHS) Homeless Assistance Program (HAP). HAP is a county-directed program that offers a variety of supportive services to individuals and families experiencing or at risk for homelessness and who can demonstrate that, with HAP intervention, they will be able to meet their basic housing needs in the near future.

HAP includes five components: bridge housing, case management, rental assistance, emergency shelter, and innovative supportive housing. A county may choose to provide one, some, or all of the components as part of its program, depending upon its unique regional needs. HAP gives counties flexibility in creating their programs because human service agencies based at the local level are intimately acquainted with the local human services network and the needs of the community. The department expects that counties will select the components necessary to create a HAP that meets the following objectives:

1. Provide homelessness prevention services that assist clients to maintain affordable housing.
2. Help people experiencing homelessness find refuge and care.
3. Assist people experiencing or near homelessness in attaining economic self-sufficiency.

The Commonwealth of Pennsylvania funds HAP through an annually state-funded block grant. The DHS Office of Income Maintenance (OIM) administers HAP and allocates a portion of the block grant funds to each county with the expectation that counties will design homeless assistance programs that meet HAP goals within the parameters outlined in the HAP I & R.

Before 2001, all counties received HAP funds as a program-specific allocation. In 2012, Act 80 introduced county-based Human Services Block Grants (HSBG) in 20 Pennsylvania counties. The HSBG combined the funds of seven human services programs, including HAP, into one block grant. The HSBG reduced overall funding for the combined human services agencies; however, it gave counties the latitude to reallocate funds among the seven human services

programs.

While the initial pilot included only 20 counties, in July 2013, Act 55 expanded the availability of HSBG funding to 30 counties. The commonwealth is evaluating the HSBG pilot with the intention of implementing it statewide.

The introduction of the HSBG presents HAP with exciting challenges. In each subsequent year following the implementation of the HSBG, HSBG counties can reallocate increasing percentages of the HSBG funds among the seven human services programs. While residents' needs will influence how counties allocate the HSBG funds, programs that demonstrate success through measurable outcomes will have greater credibility when justifying continued or increased funding.

The department provides the HAP I & R as guidance for developing effective, locally integrated Homeless Assistance Programs. The HAP I&R addresses HAP changes introduced with the HSBG and includes the HAP programs goals, descriptions of the five HAP components, criteria for client eligibility, allowable HAP expenditures, fiscal reporting requirements, and expectations for program monitoring. It also provides strategies for counties to identify program goals, measure outcomes, and use findings to refine and improve their programs (see Appendix A).

## **B. THE HOMELESS ASSISTANCE PROGRAM GOALS**

Counties receiving HAP funding will develop programs that achieve the following goals:

- Mitigate the effects of homelessness on families and individuals through prevention activities, case management services, and housing and rental assistance.
- Help families and individuals experiencing homelessness become self-sufficient and secure permanent living arrangements.
- Provide homelessness prevention activities, which allow the people who are near homeless to retain affordable housing or move to more affordable housing.
- Develop a continuum of services to support individuals and families who are experiencing or are at risk for homelessness.
- Comply with programmatic requirements (e.g. verifying and calculating

income, maintaining case notes, etc.), reporting requirements, and monitoring requirements as outlined in the HAP I & R.

### **C. CONTINUUM OF HOMELESSNESS SERVICES**

While HAP addresses housing issues specifically, in order to mitigate homelessness and help families achieve self-sufficiency, counties should view HAP as part of a larger holistic approach to human services requiring coordination between a variety of agencies and community services. Counties should coordinate HAP planning with other agencies, enabling providers to link clients to other services necessary to achieve self-sufficiency.

The community planning process should include staff from homeless service providers, state and local governments, human service providers, private foundations, local businesses and investors, the financial community, neighborhood groups, landlords and housing providers, and individuals and families who are or who have experienced homelessness.

Planning and coordinating with other county service programs will help HAP providers identify service needs, avoid duplicating services, and prevent disjointed service delivery. Counties can then leverage HAP funds to provide the most comprehensive, innovative, and cost-effective services to their residents who are homeless or at risk for homelessness.

## **II. HAP SERVICE COMPONENT DESCRIPTIONS**

### **A. CASE MANAGEMENT**

Counties use the case management component to coordinate the activities necessary for the client to obtain or retain housing and to achieve self-sufficiency. Effective case managers provide a blend of assessment and coordination services. They possess in-depth knowledge of communities and available services and housing, mixed with genuine empathy and respect for the families and individuals seeking their assistance. Case management is defined as a “collaborative process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet the client’s health and human service needs. It is characterized by advocacy, communication, and resource management and promotes quality and cost-effective interventions and outcomes<sup>1</sup>.”

Case Management begins with the intake process and assessing the client’s available resources and supports and what services the client needs. Following assessment, the case manager and the client should collaborate to develop a service plan that includes setting goals in the areas of basic life skills, health needs, financial management, parenting skills, home maintenance, job preparation skills, and/or employment skills and helping clients access the agencies and programs that can help them achieve their goals. Once the family or individual is stable, the case manager should review ongoing risk factors and provide coaching. Finally, the case manager should link the family or individuals to ongoing supports, if needed, to help them maintain long-term stability and monitor their progress to ensure the client has access to needed and desired services.

Case Management service activities include but are not limited to the following:

1. Intake and assessments for individuals who are in need of supportive services and who need assistance in accessing the service system.
2. Assessing service needs and eligibility and discussing available and acceptable service options with the client.
3. Preparation of a service plan based on an assessment with specific,

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<sup>1</sup>Commission for Case Manager Certification (CCMC). Definition and Philosophy of Case Management.[http://www.ccmcertification.org/pages/13frame\\_set.html](http://www.ccmcertification.org/pages/13frame_set.html)

attainable, measurable objectives developed in cooperation with and signed by the client (see Appendix B).

4. Referring clients to appropriate agencies for needed services.
5. Coordinating services of clients who are receiving multiple services.
6. Providing direct services such as counseling, where appropriate, budgeting, life skills, job preparation, tenant/landlord rights and responsibilities, and home management.
7. Providing advocacy, when needed, to ensure the satisfactory delivery of requested services.
8. Monitoring the continuity and appropriateness of services through an ongoing reassessment process, during which case manager and client revisit the priorities identified in the initial assessment and discuss the client's emerging concerns.
9. Follow-up to evaluate the effectiveness of services and outcomes.
10. Protecting the client's confidentiality.

Counties must make case management available to any client receiving HAP services. Case management is an important part of meeting the HAP goal of preventing homelessness because it allows the case manager to identify needs and put services in place before a family loses housing.

A major role of the case manager is advocating for families or individuals experiencing or at risk for homelessness in the search for permanent housing and in navigating the social service and educational systems. Case managers should make special efforts on behalf of homeless children by collaborating with school districts, each of which has a coordinator for homeless children who will assist in making educational arrangements during periods of transition. Case managers should develop working relationships with other community service providers, such as housing authorities and other local housing programs; the CareerLink; the County Assistance Office; local food banks; local charitable organizations; and any agencies that can support the family in achieving self-sufficiency. By working with a local network of human service agencies, the case manager can also become aware, as confidentiality allows, of the service plans

within other agencies and establish goals that do not conflict.

### **GUIDELINES – Case Management**

The following guidelines apply to case management services:

- Counties may set maximum income limits (up to 200% of the Federal Poverty Income Guidelines, see Appendix C) for the at-risk clients served in the component.
- The county may develop local policy regarding qualifying for case management services.
- Counties may require clients to receive case management in order to receive other HAP services. For example, clients who repeatedly request financial assistance may be required to participate in case management services in order to qualify for other program components.
- Counties will fund all case management functions required in HAP components through the Case Management component.
- Counties must develop a policy requiring the client's active participation in case management services in order to receive HAP-funded rental assistance or HAP-funded bridge housing services.

### **EXPENDITURES - Case Management**

DHS expects that counties will spend the majority of this HAP allocation on personnel expenses (wages, salaries, and benefits) for case managers so they may provide necessary and appropriate case management services such as:

- Intake and assessment.
- Preparation of written service plans.
- Arranging for needed medical, psychological, psychiatric, social, educational, or vocational services.
- Follow-up and client tracking.
- The cost for providing direct services such as counseling, budgeting, life

skills, job preparation, and home management as described.

**(A) Allowable Expenditures**

- Operating: office rent, communications, insurance, legal services, audits, office supplies, staff travel, overhead, and systems consultants and client tracking.
- Fixed Assets: equipment.
- Personnel: wages and salaries, benefits, and training/conferences.

**(B) Non-Allowable Expenditures**

- Payments made on behalf of clients for shelter or support services other than Case Management.
- Payments for already existing Case Management services.
- Food purchases for business meetings, client classes, training, and client recognition events.

**B. RENTAL ASSISTANCE**

Rental Assistance includes assistance to prevent homelessness or near homelessness by intervening in cases where an eviction is imminent. This may include housing payments paid on behalf of the client for:

1. Rent.
2. Mortgage arrearage for home and trailer owners.
3. Rental costs for trailers and trailer lots.
4. Security deposits.
5. Utilities to prevent and/or end homelessness or near homelessness by maintaining individuals and families in their own residences.

## 6. Expediting the movement of people out of shelters into existing housing

Service providers, in conjunction with the county, should maintain flexibility when developing criteria for disbursing funds for rent, utilities, and security deposits. For example, an agency may choose to provide only rental assistance or to establish a maximum amount of funds available for utility assistance.

The department strongly recommends that only one service provider in a county receive HAP funds to provide rental assistance services in each county. In counties where other agencies with different funding sources provide services similar to rental assistance, the county must develop a system like a clearinghouse to eliminate duplicate services and payments to a household. It is important that counties seriously consider using only one rental assistance provider because, even in counties with clearinghouses, clients sometimes make back-to-back requests from different agencies, unbeknownst to the other agency, thereby receiving assistance that exceeds the limit.

Where appropriate, service providers should encourage clients receiving rental assistance to participate in budgeting and money management training in an effort to prevent future rental crises for the client. Case Management should guide the client to become self-sufficient and be available to clients for as long as necessary. Counties that do not provide case management should refer clients to existing case management services such as the Office of Children, Youth and Families or the Office of Mental Health and Intellectual Disabilities, etc. HAP funds can purchase budgeting and money management programs from other agencies, if necessary.

The county may pay rental assistance funds for mortgage arrearage, rental costs, or utility assistance to owners of homes or mobile homes on behalf of the client. It is the payment of last resort and written documentation must support the need.

Individuals or families living in subsidized housing and Section 8 housing are eligible to request assistance with their security deposit and first month's rent. However, for this population, the county may also choose to pay for rental arrearages.

Counties may consider hotels, motels, and boarding homes as long-term housing and the county may or may not choose to assist clients with rental

assistance payments in these situations. Clients requesting this type of assistance must provide written documentation of long-term living arrangements. This documentation may include a receipt for a security deposit, a signed lease agreement, or other documentation that verifies that this unit will be or has been a long-term living arrangement.

The department does not intend for the rental assistance component to substitute as an energy assistance program. Utility assistance is available to the extent that it meets the objective of preventing homelessness for people who are able to afford their housing after receiving assistance.

In some cases, rental assistance clients may become scattered-site bridge housing clients. For example, if the client requests rental assistance and the provider determines that the rental payment to prevent eviction will only prolong the inevitable eviction, short-term rental subsidy, and supportive services is a more appropriate service to help the client become self-sufficient. The county can provide rental assistance to prevent the immediate threat of homelessness, followed by scattered-site bridge housing so the client can receive the services necessary to become self-sufficient (see Bridge Housing requirements for detail on serving clients under the scatter-site model).

When Rental Assistance funds are used for a security deposit for rent or utilities and, the client later moves elsewhere, the program may choose whether to recoup the security deposit or not. The service provider may allow the client to use the deposit as security for a new apartment. If a client or landlord returns the security deposit to the county or service provider, they can spend the returned security deposit in the year it was returned regardless of what year the deposit was originally paid. The county must show the returned deposit on the Final Expenditure Report as PROGRAM INCOME and expend it in any one of the HAP service components.

**NOTE:** Appendix D provides an example of an administrative tool that counties can use for tracking rental assistance issuances.

### **GUIDELINES – Rental Assistance**

Counties offering the rental assistance component are required to make every effort to ensure that the following procedures are in place:

- Permit the client to apply for rental assistance on the same day the

applicant visits the office.

- Interview the applicant on the same day the applicant applies for rental assistance and, and if all required verification is presented, determine eligibility at the application interview. Applications for assistance must be processed so that the client is served in time to resolve the crisis and prevent the eviction.
- If all the verification is not presented at the interview, provide the client with a pending verification list and a due-date for the pending items.
- Provide the client with a written notice approving or denying their request for assistance.
- Provide the client with written information on their right to appeal adverse actions and the process to do so (see Section VII for more details on the appeal process).
- Provide the client with written information on their appeal rights to the county and the DHS Office of Hearing and Appeals.
- Utilize collateral contacts to verify homelessness, near homeless, the amount needed to resolve the crisis, and the landlord's agreement to rent to the client in the future or to stop eviction proceedings, and hand-written or questionable documents.
- Emphasize the prevention of homelessness for families with children.
- Counties may choose, but are not obligated, to use funds to move clients from one county to another county. If a county chooses to provide funding to move a client to another county, the county should contact the receiving county HAP to inform them of the services provided and the payment amount in order to avoid duplication of services.
- Counties and providers must maintain a relationship with the County Assistance Office (CAO) to ensure that there is coordination of services (see Appendix E for more detail on the required coordination).

## **Eligibility**

To qualify for rental assistance, clients must be homeless or near homeless

AND:

- Have an agreement with the landlord to rent to them; AND
- Have sustainable income sufficient to pay rent in the future or have no income but have reasonable expectations for sufficient income in the next 90 days to maintain rental agreements; AND
- Have an income at or below 200 percent of the federal poverty income guidelines (FPIGs).

Counties and service providers must establish poverty guidelines for determining eligibility. The maximum level for income eligibility must be between 100 percent and 200 percent of FPIGs. If a county chooses to set the maximum at 100 percent, then they will serve clients who are at or below 100 percent of FPIGs. If the county serves a client with no income, the client file must reflect the reason the case manager made the decision to assist the client. This requirement ensures that HAP funds are not available to clients who will not have sufficient income within a 90-day period.

Counties and service providers must count the **total gross income and resources** of each adult person (18 years of age or older and not in high school full-time) when determining eligibility for services under rental assistance. Any government assistance (federal, state, or local), including FEMA dollars, provided to clients for rental assistance, mortgage assistance, security deposit, and/or utility assistance (except for LIHEAP) during any 24-consecutive month period must be included when calculating the maximum amount of assistance the client may receive - \$1,000 (adult-only households) or \$1,500 (households with children).

Counties and service providers do not count assistance received from Low Income Home Energy Assistance Program (LIHEAP) grants in the calculation of the \$1,000 or \$1,500 maximum available to the client. Counties may make utility payments to clients who are eligible for LIHEAP if LIHEAP funds are not available. Exclude diversion benefits that families receive from the CAO when determining eligibility or the amount of HAP assistance. (See Section VI. Income and Resources for a full discussion of income and resources counted and excluded when determining eligibility for services).

Counties must retain copies of the income and resource verification, the

calculations used to calculate eligibility, and amount of assistance granted in the client record (for more information about client records, see Section III, C).

**NOTES: People seeking rental assistance who are escaping domestic violence do not have to meet income guidelines. If they have received rental assistance in the past, the county may disregard the maximum limits. The county will accept the following verification that the client is experiencing domestic violence:**

- **Any type of documentation including law enforcement records, court records, medical/treatment records, social service records, child protective service records.**
  
- **Third party verification from:**
  - **A domestic violence service provider;**
  - **A medical, psychological, or social service provider;**
  - **A law enforcement professional;**
  - **A legal representative; or**
  - **An acquaintance, friend, relative, or neighbor of the claimant, or other individual.**
  
- **If the individual is unable to safely obtain any of the items above, the client may self-affirm domestic violence, and the county will determine if the clients' request is reasonable.**

**Providers must maintain client privacy and safeguard all domestic violence information to the fullest extent possible. Providers must assure individuals that the personal data that they provide will be confidential. This is of critical importance to domestic violence victims since their physical well-being or life may be endangered should the abuser learn their whereabouts. Protecting the victim's address as well as other pertinent data is vital to family safety.**

If a countywide disaster occurs, those affected should seek assistance from the Red Cross. If the client requires additional assistance, that may be provided by HAP. Counties should not use HAP funds to duplicate available services but can be used in addition to other services when necessary. In the event of countywide disaster, the county must contact the HAP Program Manager for permission prior to disbursing any HAP funds.

HAP funding should be the resource of last resort.

### **Benefit Amount, Frequency, and Mode of Issuance**

During a consecutive 24-month period, clients may receive up to a maximum of \$1,000 for adult-only households or \$1,500 for families or households with children. A “household” is defined as one or more persons, related or unrelated, who reside or intend to reside in a common residence. The 24-month period begins with the issuance date of the first check. When determining client eligibility, providers should ask if the client has resided in another county within the past 24 months and, if so, contact the county HAP to inquire if the client received services and the payment amount, in order to avoid duplication of services. Counties should respect client confidentiality and seek permission for release of information from the client. Counties must maintain the releases in the client record (see Section III, C and Appendix G related to client records).

If a household requesting assistance includes an adult member who, within the past 24 months, received a rental assistance payment as a member of another household, the provider may issue a payment to the household. However, the provider must calculate the amount of assistance the household member already received and deduct it from maximum assistance available to the new household.

EXAMPLE: John resided in a household of four 12 months ago and received \$1000 in rental assistance. John moved and now resides in a household requesting rental assistance. The new household qualifies for \$1500 in rental assistance. The provider prorates the assistance John already received by dividing \$1000 by the four household members who received it. The provider then deducts John’s \$250 share from the new assistance amount to arrive at \$1250 ( $\$1500 - \$250 = \$1250$ ).

Clients sometimes receive the maximum assistance available to them within a 24-month period and then return for further assistance in the next 24-month period. DHS developed HAP to resolve crises and provide the supports necessary to move families into self-sufficiency. DHS does not intend for clients to use HAP assistance as an ongoing income supplement. Therefore, counties may choose to establish a policy of offering lower maximum amounts for return clients who request additional services in a subsequent 24-month period. For example, some

counties provide 100 percent of the maximum in the first 24-months but reduce the maximum amount of assistance available to returning clients by 25 percent in each subsequent 24-month period. Counties must develop a policy requiring return clients' active participation in case management services and ensure that return families follow-through with their service plans in order to receive services.

Counties may provide rental assistance in a lump sum or in incremental payments. Divide the total amount of the payment as equally as possible among each adult in the household. This will assist in determining eligibility if an adult member of the household returns for services as a member of a new household. Providers in conjunction with the landlord may decide to pay the client's arrearage in incremental or lump sum payments. In some cases, it may be necessary to make incremental payments to insure that the client continues with the recommended support services or counseling sessions.

## **EXPENDITURES - Rental Assistance**

### **(A) Allowable Expenses:**

- **Operating:** office rent, communications, insurance, legal services, audits, office supplies, staff travel, overhead, and systems consultants.
  
- **Fixed Assets:** equipment.

Rental Assistance payments, including rental payments or arrearage, utility payments or arrearage, lot rental payments, mortgage arrearage for home or trailer owners and security deposits for rental units for clients up to a maximum of \$1,000 for adult-only families or households or \$1,500 for families or households with children within a 24-month period.

Payments for clients facing eviction are only permitted when the service provider has confirmed that the landlord will drop the eviction and continue to rent to the client if rental assistance payment is granted.

- **Personnel:** wages and salaries, benefits, and training/conferences.

## **(B) Non-Allowable Expenditures**

- Assistance towards the down payment for the purchase of a home.
- Payments for equipment, such as a furnace, water pump, stove, etc.
- Payments of liens.

## **C. BRIDGE HOUSING**

Bridge Housing is a transitional service that allows clients who are in temporary housing to move to supportive long-term living arrangements while preparing to live independently. While in this program, **clients must receive case management and supportive services and must have a service plan that describes how the program will assist clients for up to 18 months with the goal of returning clients to the most independent life situation possible.** This component "bridges" the gap between Emergency Shelter and stable long-term housing. The client is eligible to remain in the program for **12 months**; however, the county may permit the service provider to extend a client's length of the stay from **12 to 18 months** without DHS approval. The county must request a waiver from DHS OIM to extend a client's stay **beyond 18 months**. The required justification must include an explanation of the client's circumstances and proposed goal plan.

The department recommends that the programs accommodate no more than 25-30 people. This ensures that bridge housing is not a substitute for Emergency Shelter Services. Counties may provide Bridge Housing in one or any combination of the following:

1. **A shared facility** - a purchased or leased building with shared living areas and individual sleeping areas.
2. **A centralized unit** - a purchased or rented building with individual apartments.
3. **A scattered site unit** - a rented apartment that exists independent of a common building.

## **GUIDELINES – Bridge Housing**

Counties offering the bridge housing component are required to follow these procedures:

- Inform Bridge Housing clients in writing that the Landlord-Tenant Act is not applicable to housing provided with HAP funds. However, in cases of scattered site units where the client signs the lease with the landlord verses the provider signing the lease with the landlord, the Landlord Tenant Act does apply. In this case, the provider should inform both the client and the landlord, in writing, that if the client is terminated from HAP services, the HAP rental payments and case management services will be discontinued and the client will be solely responsible for future rental payments.
- Develop a client contribution policy and a client savings plan:
  - **Client Contribution Policy** – Providers must develop a sliding fee scale for room and board and charge clients appropriately for services according to the scale.
  - **Client Savings Plan** – Providers may reserve a portion of the money collected from clients for room and board to assist the client at the time of discharge from the program to establish living arrangements. The provider should deliver the savings to the client indirectly, in the form of payments on behalf of the client, to avoid jeopardizing the client's eligibility for public assistance benefits.

EXAMPLE: One county offers client savings plans that allow families to save up to 30 percent of their monthly gross income (after expenses). The provider maintains the savings account on the family's behalf. The provider requires that clients sign a form or log when submitting payments to the account to ensure accuracy and good accounting of the savings. When the family has an immediate or emergency expense and requests to make a withdrawal, the provider asks for a receipt to verify that the family used the withdrawal to avert the emergency.

**NOTE: If a client damages a unit beyond the normal wear and tear, or if a client chooses to discontinue room and board payments when he or she has sufficient income, the provider may access the client's savings acquired from the client contribution to pay for repairs or room and board arrearages.**

**Providers must make clients aware of this possibility when they enter the program. The client's signature on a form describing the client contribution policy is proof of his or her awareness of the policy. If the provider accesses the client's savings for this purpose, the provider must notify the client in writing and provide an opportunity to resolve the problem. The provider may access client contribution funds and saving for these purposes only.**

**The department does not require that counties include activities related to accessing client contributions and/or client savings on the annual expenditure report submitted to the department; however, the service provider should maintain clearly documented records on this activity for audit purposes.**

- Establish a policy for re-enrolling clients that considers the circumstances of the client at the time of the initial enrollment and discharge, the period between discharge and current application, and the client's goals and motivation.
- Obtain approval for occupancy of the housing facility from the Department of Labor and Industry or, where applicable, from the following local agencies: the Department of Community Development in the City of Scranton; the Department of Public Safety in the City of Pittsburgh; or the Department of Licenses and Inspections in the City of Philadelphia.
- Housing arrangements for single adults at scattered sites or group living facilities must comply with one of the two lease arrangement options below.
  1. The service provider may lease the apartment for program purposes and allow program clients to reside in the units as guests. Clients would be required to vacate the premises upon completion of or termination from the Bridge Housing Program; or
  2. The Bridge Housing Program client may lease the apartment and the program may subsidize the rental cost. When the client completes the program or terminates participation, the rental subsidy and the Case Management will discontinue and the client may continue to reside in the apartment as a long-term resident.
- Maintain a complete description of each facility used in this program and

fully address funding for each facility. This includes the amount of reimbursement claimed for renting or acquiring real property and how the provider computed the reimbursement. The basis for this computation must be specified, e.g., funding a down payment, mortgage amortization, depreciation, payment of the full acquisition cost, etc.

- Any property purchased with Bridge Housing funds after Fiscal Year 1994-1995 must name the county as titleholder. The department must approve proposals for the purchase of real property and will establish allowable cost standards for real property on an individual project basis. If, in acquiring real property, the seller charges the county an amount in excess of the fair rental value, the county must assure that it will continue to use the property in the original grant program as long as there is a need for such property to accomplish the purpose of the program, whether or not the program continues to be supported by state funds. If a county cannot comply with such an assurance or retention of such property is not necessary, the department may require the county to reimburse it for its share of the remaining value of the property. The county will use a straight-line depreciation computation to determine the reimbursement due to the department.

## **EXPENDITURES - Bridge Housing**

### **(A) Allowable Expenditures**

- **Operating:** office rent, communications, insurance, legal services, audits, office supplies, staff travel, overhead, occupancy, and systems consultants.
- **Fixed Assets:** real property, equipment, furnishings, repairs, and renovations.
  - Minor renovations or repairs (e.g., adaptations of available space within a completed structure) to facilities owned or leased by service providers. The county must describe these renovations or repairs on the Schedule of Renovations/Repairs. If the provider agency requests only repairs to a facility, the county must approve and maintain the request at the county.

If the provider agency requests renovations to a facility, the county must include the Schedule of Renovations/Repairs with the Pre-Expenditure Plan submitted to the department for approval. Approval of proposals by the department will result in the establishment of allowable cost standards for renovations on an individual project basis.

- Requests for real property purchases. Counties must describe requests for real property purchases in a narrative that addresses the following areas: the total purchase price, projected costs they will charge to the HAP, provider agency name, targeted clients, and any other available documentation.
- Occupancy costs, including rental and acquisition costs for real property (e.g. land, structures, and appurtenances, thereto, excluding movable fixed assets and land improvements). Rental costs are allowable but must not exceed the fair market value. This value may be determined by documenting the rental charge to the public for similar space in that geographical area, or by obtaining a fair market rental appraisal from an independent real estate appraiser. Any income earned on property purchased with HAP funds must be returned to the HAP to be used for program services. Title XX, Social Services Block Grant, funds cannot be utilized for the acquisition costs for real property.
- Purchased client services that directly support clients and are not available from any other existing resources. This may include but is not limited to day care, transportation, mental health, budget and money management, and counseling services. This can also include transporting clients to job training and/or job interviews, and in certain instances, unexpected car repair expenses for a client's car. In very rare instances, a client's progress in the program may be dependent upon transportation in a program that does not fund transportation as a support service and public transportation is not available.

- Room and board and clothing costs for clients.
- Housing payments paid on behalf of the client for rent, utilities, and security deposits.
- Furniture and appliances purchased for use by clients while in the program. Providers may give clients furniture acquired through donations or secondhand purchases, and with no appreciable value, upon discharge from the program.
- **Personnel:** wages and salaries, benefits, and training/conferences.

### **(B) Non-Allowable Expenditures**

- Mass shelter (nights).
- Motel/Hotel/Boarding homes.

## **D. INNOVATIVE SUPPORTIVE HOUSING SERVICES**

The Innovative Supportive Housing Services component enables the service provider to design a supportive housing service for people experiencing or at risk for homelessness that is outside the scope of existing HAP components. Clients must meet the basic eligibility requirements for the HAP. A project is innovative when the particular approach is new to the area, is a sensible model, and other communities can duplicate it. Many programs and funding sources address employment and job training services; therefore, unless the county demonstrates how the service is unique or unduplicated by any other provider in that county, the department does not consider these services innovative and they are not eligible under this category.

The HAP allows counties the flexibility to provide innovative supportive housing services that address unique county needs. The innovative service should **NOT** be a variation of an existing service.

An example of an innovative service is establishing a clothes closet to assist those clients who need appropriate attire for a scheduled job interview, if such a service does not already exist in that area. Another example is providing

transportation for shelter clients. This may include bus tokens, and/or cab vouchers to distribute to clients who need transportation to job training programs, job interviews, places of employment, or behavioral case assessment appointments. Also, counties can use HAP dollars to leverage matched funding for the Emergency Solutions Grant/Rapid Re-housing. The county applies HAP dollars to the Intensive Case Management portion of the ESG/RR.

The county must submit a complete description of the service it intends to provide within the annual Pre-Expenditure Plan, including an explanation of why the county considers this an innovative program. DHS OIM will approve innovative supportive housing services on a county-by-county basis.

### **EXPENDITURES - Innovative Supportive Housing Services**

The department will establish allowable and non-allowable expenditures on a county-by-county basis.

### **E. EMERGENCY SHELTER**

This component provides refuge and care to persons experiencing homelessness and in immediate need because they have no permanent legal residence of their own. Services include mass or individual shelter in congregate settings, and individual shelter paid through a voucher system to house clients in hotels or motels for an average of three to five days, up to a maximum of ten days. Counties may request a waiver if a hotel or motel stay must exceed the 10-day maximum. County Pre-Expenditure Plans must indicate the maximum number of shelter day stays for any client allowable during the fiscal period.

### **GUIDELINES – Emergency Shelter**

Counties offering the emergency shelter component are required to follow these procedures:

- Shelters that receive HAP funds must meet applicable fire and panic regulations, and local health and safety laws/requirements.
- HAP Emergency Shelter component administrators must coordinate with the administrators of the Local Emergency Food and Shelter Assistance Board that administers the Federal Emergency Management Agency (FEMA) funds, in counties where a local board exists.

- Providers must prorate client numbers based on a percentage of the shelter’s total funding.
- When placing a family in a hotel or motel, the provider cannot pay for meals separately. Meals are eligible expenditures only if they are included as part of the billing or per diem charged for the overnight stay. Do not list the meals as a separate expense but rather as part of the total overnight bill. When contracting for mass shelter services, providers should strongly consider per diem rates because certain items such as food and staff salaries are NOT allowable expenditures unless they are included in the per diem rate.
- If the HAP County Contact and the local homeless service planning committee identify an operational or programmatic need to charge clients a fee to access emergency shelter, the HAP County Contact should submit a waiver request to DHS OIM. The request would be to waive the relevant portion of the HAP emergency shelter service requirements and should include justification for the request (identify the need and explain how the fees would be used to resolve the issue). In addition, the request should describe how the waiver will improve administrative efficiency, improve health and safety of clients, and foster client independence.

DHS OIM will only grant waivers for fees that are a percentage of income, not a flat fee. DHS OIM does not allow a minimum fee. In no case, may the percentage be more than 15 percent of a client’s income. The county must put any fees collected back into the emergency shelter program, to cover program or operational costs. The county must base access to HAP-funded emergency shelter programs solely on need, not on income.

## **EXPENDITURES - Emergency Shelter**

### **(A) Allowable Expenditures**

- **Personnel:** wages, salaries, and benefits, only if they are part of a mass shelter per diem rate.
- **Operating:** mass shelter supplies such as cots, blankets, and personal hygiene items.
- **Client:** mass shelter nights, motel, and hotel stays.

- **Food and wages, salary and benefit expenses** only when they are part of a shelter per diem rate or included as part of the billing for the overnight stay.
- **Mass shelter housing costs** such as cots, blankets, and personal hygiene articles.
- **Emergency lodging costs** (e.g. hotel, motel, or group living facilities), if incurred by using a voucher system and only when the need arises.

**(B) Non-Allowable Expenditures**

- Rental payments.
- Mortgage subsidies.
- Utility payments.
- Renovations/repairs.
- Real property.
- Equipment purchases exceeding \$300.
- Food purchases and wages, salaries and benefits that are not included in the shelter per diem rate.
- The purchase or improvement of land, or the purchase or construction or permanent improvement other than minor remodeling of any building or other facility.
- The provision of cash payments for the costs of subsistence or for the provision of room and board **except** for temporary emergency shelter provided as a protective service.
- Paying wages for a client as a social service.
- Providing medical care unless it is an integral but subordinate part of a social service.

- Social services provided in and by employees of any hospital, skilled nursing facility, intermediate care facility, or prison or to any individual living in such institution.
- Providing any educational service that Pennsylvania generally makes available to its residents without cost and without regard to their income.
- Providing cash payments as a service.

### **III. HAP REQUIREMENTS**

#### **A. CLIENT ELIGIBILITY**

To be eligible for services in any of the HAP components, clients must be:

1. U.S. citizens, U.S. noncitizen nationals, and "qualified aliens"; AND,
2. Income eligible, defined as having income at or below 200% of the Federal Income Poverty Guidelines (FPIG) (except in cases of domestic violence or disaster, see note below); AND,
3. Without readily accessible resources sufficient to resolve the housing crisis; AND,
4. Homeless or near homeless (as defined below); AND,
5. Eligible for the specific service component(s) from which they are seeking services, based on that component's eligibility criteria.

**NOTE: The criteria above do not apply to those who need HAP services due to a disaster or domestic violence or persons seeking Emergency Shelter services. In these cases, HAP providers base eligibility solely on need.**

HAP providers must ask each applicant for proof of their citizenship and identity and proofs for each other persons for whom they are applying.

Youths 17 years of age and younger, living as part of a family unit, and not emancipated, **are not eligible** to apply for HAP services.

An individual is considered an emancipated minor, and may apply for HAP services if he or she is:

- 17 years of age or younger; AND,
- Married or separated from a spouse; AND,
- A parent caring for children and is not part of a family unit.

**NOTE: Please see the descriptions of each service component in Section II for additional client eligibility requirements specific to each component.**

Agencies define "homelessness" in many different ways. For example, the federal agency on Housing and Urban Development (HUD), defines four categories of

homelessness: Category 1 – Literally Homeless; Category 2 – Imminent Risk of Homeless; Category 3 Homeless Under Other Federal Statutes; and Category 4 – Fleeing/Attempting to Flee DV.

HAP does not use the HUD definitions of homelessness. For HAP purposes, individuals or families are considered **homeless** if they are experiencing any of the following:

1. Reside in a group shelter; domestic violence shelter; hotel or motel paid for with public or charitable funds; a mental health, drug, or alcohol facility; jail; halfway house; or hospital with no place to reside; or living in a home, but due to domestic violence, needs a safe place to reside.
2. Have received verification that they are facing foster care placement of their children solely because of lack of adequate housing, or need housing to allow reunification with children who are in foster care placement.
3. Live in a "doubled-up" arrangement for six months or less on a temporary basis due to an emergency.
4. Live in a condemned building.
5. Live in housing in which the physical environment presents life and/or health threatening conditions (e.g. dangerous structural defects; lacks plumbing, heat, or utilities).
6. Live on the streets, in cars, doorways, etc.

HAP considers individuals or families **near homeless** if they are facing eviction. An individual or family is facing eviction if they have received either written or verbal notification from the landlord that they will lose their housing unless some type of payment is received. The county must follow up on verbal notification and obtain written documentation.

## **B. COUNTY/PROVIDER RESPONSIBILITIES**

The county may retain primary responsibility for delivering HAP services or the county may subgrant funds to nonprofit agencies to deliver services. If the county subgrants the administration of the HAP, the subgrantee is responsible to meet all county requirements. When counties subgrant HAP services to other agencies, the county remains the department's point of contact for the county HAP services. When the county HAP administrator is unavailable, DHS reserves the right to contact subgrantees directly. Counties must provide the DHS HAP Program Manager with a list of subgrantees and contact information upon

request. In all cases, the county is ultimately responsible for compliance with the following county and provider requirements:

## **GUIDELINES - COUNTY**

Counties must:

- Monitor each service providers' compliance with HAP requirements as reflected in the HAP I & R (see Section IX for more details regarding monitoring). The county must maintain written monitoring reports at the county office. The reports must identify any programmatic or administrative issues that the service provider must resolve and the service provider's plan for resolution and follow-up. These reports are subject to review by the department, Auditor General, federal auditors, and other persons authorized by the department. At a minimum, counties must complete monitoring reviews and written reports at least once every 12 months.
- Develop a written agreement with any agency/office that assumes the administrative responsibility of the HAP that describes both entities responsibilities.
- Developing a written agreement between the county and each of the county's service providers to allow monitoring and ensure compliance with the HAP I & R.
- Coordinate HAP services with services provided by agencies identified in "The Consolidated Plan".
- Review, approve, and summarize all HAP reports submitted to the county by service providers and **submit the county summaries ONLY** to the department. The county must maintain the provider reports.
- Maintain an inventory list of the county and service providers' fixed assets (an individual item over the cost of \$300 with a useful life of more than one year) on a fiscal year basis and compare projected purchases with actual purchases.
- Establish low-income guidelines for each HAP component and maintain those guidelines at the county.
- Comply with timeframes for reporting and requests outlined in Appendix F.

## **GUIDELINES - PROVIDER**

Providers must:

- Maximize the use of other public and private community resources to leverage state HAP funds for both the county and service providers. Counties and service providers may accept monetary contributions from public and private organizations, as well as donations of property, equipment, and supplies, including accessing food and clothing banks, and utilizing volunteers.
- Ensure that participation in the HAP is not dependent upon a client's affiliation with, or attendance at, religious or political activities.
- Ensure that the program does not discriminate against any person because of race, color, religious creed, ancestry, national origin, age, sex, disability, life style, or sexual orientation. Any person who believes that denial or termination of services is based on discrimination because of any of these reasons must be informed by the county of their right to appeal to the Pennsylvania Human Relations Commission.
- Ensure that only homeless or near homeless clients are served with HAP funds and that funds are expended only on allowable services as described in these Instructions and Requirements.
- Collaborate with other community organizations or agencies such as County Mental Health and Intellectual Disability Programs; CAOs; private industry councils; Social Security Administration; local food banks; Veterans Administration; and other agencies for necessary services for each client. Service Providers that serve homeless children should work with the school district's liaison to insure the education of homeless children. The names of the liaisons are available from local school districts or the Pennsylvania Department of Education.
- Meet applicable Fire and Panic Regulations, and applicable health and safety requirements for all facilities where service is provided, whether rented or owned by the county or service provider.
- Purchase or rent facilities that fall within the fair market value for the area.  
**This does not apply to the Rental Assistance and Case Management**

## **components.**

- Involve local fire officials in purchase and renovation decisions.
- Secure insurance on purchased facilities, which protects the program's investment.
- Ensure the protection and privacy of sleeping arrangements for all clients in facilities housing more than one target population.

## **C. Client Records**

Service providers must maintain client case records, client intake procedures, and maintenance of service records for each client. The provider must maintain records that consider client confidentiality, but which share information that benefits the client. Counties and providers should consider the populations they serve and understand the risks and implications for particular clients if confidentiality is breached (e.g. when serving people experiencing both homelessness and domestic violence, the service provider must be cognizant of the risks facing the client and not allow breaches of confidentiality to place the person at increased risk).

Service providers may choose the format for their client records. The HAP I & R provides a sample client record in Appendix G, which can guide how counties and providers design comprehensive, easily navigated client records. At a minimum, client records must contain:

- Releases of information.
- Copies of client ID, SS card, and other proofs of identification.
- Intake and assessment forms.
- Acknowledgements of rules and regulations, rights and responsibilities, appeal process, etc.
- Service Plans.
- Referral form.
- Proofs of income and resources.

- Verifications provided demonstrating need for services (e.g. eviction notices, leases, bills, utility termination notices, etc.)
- Calculation worksheets used to determine eligibility and amount of assistance (e.g. rent disposition work sheet).
- The amounts and dates of assistance.
- Case notes.
- Approval or denial notices.
- Any document specific to a client's participation in a particular component.

#### **D. Written Agreements**

Service providers must develop written agreements between the provider agency and the client (**NOTE: A written agreement is not required for Emergency Shelter clients**). At a minimum, the written agreement must include the following items:

1. Basic expectations of the client.
2. The criteria for termination from the program.
3. The procedures a client follows if they want to appeal denied or terminated services.
4. Fee schedules for room and board, where appropriate. The fee schedules are subject to review by department staff at the time of monitoring of the HAP. This is not required in the Emergency Shelter component.
5. Notification that the Landlord-Tenant Act is not applicable to housing provided with HAP funds. **NOTE: The Landlord-Tenant Act applies only to scattered site units where the client signs the lease with the landlord versus the provider. See page 12, last paragraph, for more information on this requirement.**
6. Notify rental assistance clients who return for services after the 24-month period that they may be eligible for a lesser amount and must be required

to participate in case management in order to receive any rental assistance.

In addition to these items, the provider agency may want to consider including the amount of client contribution the client is responsible for as well as any other type of pertinent information of which the client should be aware. For example, the service provider should provide Bridge Housing clients written information that the provider can access client's savings for damages to the unit or for non-payment of rent.

#### **IV. ALLOWABLE HAP EXPENDITURES - GENERAL**

The department will financially participate only in expenditures that are necessary and proper for the operation of the HAP and for providing eligible services to eligible clients. The department will participate in expenditures for supplies, property, and services only if these are obtained in accordance with the applicable county code. (See 16 P.S. Sections 1802, 5001, and 7377.) Expenditures must be reasonable to the extent that they are of the same nature as expenditures that a cost-conscious and prudent buyer would make in the marketplace.

The department's financial obligation is limited to the amount of the grant. The department is not responsible for funding a deficit incurred by a county or service provider.

In some instances, generally prior to receiving the first HAP monthly payment of the new fiscal year, some counties find it necessary to borrow funds from a lending institution or request a cash advance from the county human services department in order to maintain uninterrupted services to clients. If it is necessary for a county to borrow funds pending the receipt of HAP funds and the county incurs interest charges, the interest charges and the amount borrowed may be repaid from the county's HAP allocation.

Counties **may not** encumber funds out of the grant for costs that they anticipate incurring in succeeding years. Counties must budget for a 12-month

grant period. Funding for future fiscal years is contingent upon approval of the Legislature. The department will participate in expenditures for the following budget items:

1. County administration.

- Expenses required at the county level to administer the program including, but not limited to, grant management and reporting.
- Coordination between service providers and the county. This includes, monitoring and managing the service provider's programs, supportive activities such as procurement and data processing, and maintaining relationships with other community organizations, representatives of the department, and other grant recipients.

**County administration costs charged to HAP funding are limited to a maximum of 10 percent of the county's total available funds which includes the allocation plus interest earned plus client contributions and other income.**

2. The department will fund counties' indirect costs; however, the department limits its participation to **2 percent** of the grant. These indirect costs must be a part of county administration costs and part of the maximum amount allowable for county administration.
3. Costs that the county can assign to an individual client (e.g. typing reimbursement checks, determining Medical Assistance eligibility, completing application forms, etc.) are considered direct service provider costs and not part of the **10 percent** county administration costs limitation.
4. Wages and salaries before taxes and deductions for all personnel, including temporary employees, who are working in the HAP. **See section II. E. for restrictions that apply to Emergency Shelter components.**
5. Benefits paid on behalf of personnel by the service provider including, but not limited to, medical insurance, retirement plans, unemployment compensation tax not paid by the employee, life insurance, medicare, and social security tax. **See Section II. E. for restrictions that apply to Emergency Shelter components.**

6. Training and education costs for HAP employees including conference registrations, travel to the training or conference site, and reasonable subsistence and meal costs while in overnight travel status for activities that directly benefit the program. **This is NOT an allowable expense for the Emergency Shelter component.**
7. Staff travel rates negotiated between the county and the service provider, not to exceed 37.5 cents per mile. **This is NOT an allowable expense for the Emergency Shelter component.**
8. Fixed Assets/Equipment, i.e. major items excluding real property which have a useful life of more than one year, or which can be used repeatedly without materially changing or impairing their physical condition with normal repair, maintenance, or replacement of components. This does not include the purchase of vehicles. **Fixed Asset expenses are NOT allowable in the Emergency Shelter component.**
  - a. Ownership of fixed assets/equipment with a unit price of \$300 or more, which are acquired with HAP funds, will remain with the county during the term of the grant. This includes equipment purchased by the county for its own use and equipment purchased for service providers which was paid for in full at the time of acquisition or within the grant period in which it was acquired.
  - b. Upon termination or cancellation of the grant, disposition of equipment which has a remaining useful life and to which the county holds title will be settled according to the following provisions at the discretion of the department.
    - i. The county may use the equipment in the original grant program as long as there is a need for such equipment to accomplish the purpose of the program, whether or not the program continues to be supported by state funds.
    - ii. The county may transfer such equipment at no cost to another county designated by the department.
    - iii. The county may acquire the equipment by reimbursing the department for the remaining useful life of the equipment on the basis of an independent third party appraisal. Depreciation

tables may be substituted for an independent appraisal whenever feasible.

- iv. The county may sell the equipment and reimburse the department for its appropriate share or the department may permit the county to add the proceeds from the sale to its available funds for the fiscal year in which the equipment was sold and use the funds for eligible HAP expenditures during the same fiscal year.
- c. a. and b. above apply to real property purchased with Bridge Housing dollars.

## **V. FISCAL RESPONSIBILITIES**

### **A. Cost Allocation Plan**

Counties and service providers with more than one funding source for services to people who are homeless or near homeless must have a written cost allocation plan that demonstrates equitable cost distribution. This cost allocation plan must be implemented and available for inspection by the department upon request.

### **B. Grant Revocation**

In the event of termination or cancellation of the grant, the county will submit a financial accounting of revenue and expenditures to the department no later than sixty days after the termination date. No reimbursement will be made for any payment due that is not submitted in accordance with this provision.

### **C. Payments**

The HAP allocation will be paid to counties in quarterly payments and will reflect one-quarter (1/4) of the annual allocation.

### **D. Automated Clearing House Process**

Counties may choose the Automated Clearing House (ACH) process for receiving monthly payments versus the U.S. mail system. The ACH process provides for electronic transmission (direct deposit) of HAP monthly payments into a designated account. If the county is interested in participating in the ACH process, contact the Commonwealth of PA, Bureau of Payable Services at 717-346-2676.

After the ACH is set up, the county must forward the vendor number (including the suffix, if applicable), bank and account information to [ra-cyunit@pa.gov](mailto:ra-cyunit@pa.gov), so DHS's Bureau of Financial Operations can update its records and be sure that future payments are submitted as ACH.

### **E. Holding Funds**

If the current Pre-Expenditure Plan and/or the previous fiscal year Final Expenditure Report is not submitted timely or correctly, the department will hold HAP payments until all outstanding reports are received. When acceptable reports are received, payment will be made.

### **F. Unexpended Funds**

The department will review grants against actual expenditures at the end of the grant period. In the event funding for the program is continued, funds unexpended by June 30 may be retained by the county and utilized for the provision of services in the next fiscal year that begins July 1. The department will reduce payments in the next fiscal year by the amount of the unexpended funds. In the event funding is not continued, funds unexpended by June 30 of the fiscal year must be returned to the department by August 15.

### **G. Earned Interest**

All funds received by the county through the HAP must be placed in an interest-bearing account and interest earned can be spent in any one of the HAP components and can be included in a move of funds from one component to another. Income received from interest and other sources must be considered as first funds spent. The interest earned must also be reported to the department on the final expenditure report; however, it is available for use by the county in the HAP.

### **H. Accrual Accounting**

The county and service providers must report expenditures and revenues on an accrual basis. This requires the reporting of expenses, purchases and other bills in the period when incurred (regardless of when paid), and the reporting of revenues, fees, and contributions in the period when earned (regardless of when received). The intent of this requirement is to provide an accurate financial statement of the expenditures.

## **I. Audits**

All counties and service providers are subject to review and audit by the department, Auditor General, federal auditors (where applicable), and persons authorized by the department to determine compliance with statutes, regulations, and policies. The county must submit to the department information on this program for the single county audit.

The department encourages the counties to include in their written agreement with service providers the requirement for a single audit. For accountability purposes, counties are encouraged to require a program audit that, if needed, can be used by the county single auditor. Costs for the audit may be considered county or subgrantee administration costs or service costs or a combination of categories. The audit of the program may be used to support the single audit, but duplication of costs may not occur. All funds received by the county through the HAP grant will be subject to the single county audit. Due to the size of most HAPs, it is likely that the testing criteria for a single county audit may not include the HAP.

## **J. Maintaining Fiscal Records**

The counties and service providers must maintain books, records, documents, and other evidence pertaining to costs and expenses of the grant to the extent and in such detail as will properly reflect all costs and expenses of whatever nature for which reimbursement is claimed or payment is made under the grant. Books, records, documents, and other evidence will be maintained according to generally accepted accounting principles.

Financial records, supporting documents, statistical records, records for nonexpendable property, and all other records pertinent to HAP grants will be retained for a period of four years following submission of the Final Expenditure and Client Reports to the department.

If any litigation, claims, or audit is started before the expiration of the four-year retention period, the records will be retained until litigation, claims, or audit findings involving the records is resolved.

Authorized representatives of the department or federal government, where applicable, will have access to any pertinent books, documents, papers, and records to make audits, examinations, excerpts, and transcripts. If it is determined that the records possess a long-term value, they will be transferred, as requested, to the department.

## **K. County Human Services Planning and Expenditure Reports**

Act 80 of 2012 requires the Department of Human Services to streamline the planning and reporting requirements for county human services programs. The Homeless Assistance Program Manager no longer provides the guidelines for completing the annual County Human Services Plan and Expenditure Reports. The Department of Human Services, Bureau of Financial Operations provides the reporting guidelines, templates, and reporting due dates to both block grant participating counties and non-block grant counties. Counties must make revisions to these plans through The Department of Human Services, Bureau of Financial Operations.

## **L. Annual Client Data Report**

A county-summarized Client Data Report must be submitted to the HAP Program Manager annually. Counties must provide the Annual Client Data Report to the HAP Program Manager by July 31<sup>st</sup> of each year. The HAP Program Manager sends the report template to the counties each year prior to its due date. The HAP manager provides directions for completing the Client Data Report with the report template.

Counties should maintain quarterly Client Data Reports locally, to help them assess service usage and to make preparing the annual report manageable. However, to streamline planning and reporting requirements, only the annual report is submitted to the HAP Program Manager. Counties with subgrantees are responsible for collecting and aggregating provider reports and preparing one county report for the HAP Program Manager. Counties must maintain provider client reports and have them available to auditors and department staff upon request. The service provider must ensure that it reports to the county on a timely basis all HAP information required by the department.

The Client Annual Data Report collects information used by the Department of Human Services to show the populations of homeless and near-homeless that are being served within the state of Pennsylvania and to gauge changes in the housing needs. HAP data is also used by the budget office for analysis and to help determine HAP allocations. Collecting accurate information is vital for ensuring that the Commonwealth continues funding HAP. The Client Data Report is intended to capture an unduplicated client count. This means that if an individual receives services more one time in a year, he or she only gets counted one time. Counties must make every effort to produce reports that reflect the number of unique individuals served. **See Appendix H for the reporting form.**

## **VI. Resources and Income**

HAP providers must consider an applicant's gross income and readily accessible resources when determining HAP eligibility. Further, once the provider determines eligibility, it must also determine if the client can sustain the property with the HAP service he or she receives. This section outlines the income, resource, and affordability guidelines that counties must follow to ensure consistency in determining financial eligibility across HAPs (see Appendix I for sample Income, Resource, and Affordability Calculation worksheets).

### **A. INCOME:**

Income is:

**The total gross income that a family or household has received in the 30 days prior to the date of application from all sources before deductions.**

The county will follow these steps for calculating gross income when determining eligibility (see Appendix I for the Income Calculation Worksheet that the department provides for making income calculations):

STEP 1: Add the gross income in the 30 days prior to the date of application (from all sources - before deductions) to arrive at a total.

STEP 2: Divide the total by the number of weeks in the 30-day period. The

provider uses this weekly average as a representative week.

STEP 3: Multiply the representative week by 52 to arrive at an estimated annual gross income or multiply by 4.33 to arrive at an estimated monthly gross income.

STEP 4: Clients with an estimated annual or monthly gross income at or below the county's Federal Income Poverty Guidelines (FPIG) limit are income eligible for HAP services (see Appendix C FPIGS)

If the client is income ineligible due to exceptional circumstances (for example, receiving extra pay during the 30 days, overtime, fluctuating pay, etc.), counties **will look back at 90 days of gross income**. When a family has fluctuating income that makes them ineligible in the 30-days prior to application, averaging 90-days of income provides a fairer estimate of the family's monthly income for determining eligibility. The 90-day timeframe extends backwards from the date of application.

**EXAMPLE:** Mr. Ames is a repairperson whose gross income varies from week to week depending upon the number of jobs he gets.

Mr. Ames applies for HAP services on December 31. His estimated annual gross income based on his December pay exceeds 200% of FPIGS; however, he had very little gross income in October and November, leading to his housing crisis. The HAP provider decides that it is appropriate to look at the last 90 days of Mr. Ames' income – December 31 back through October.

Mr. Ames provides proof of his October, November, and December gross income. The HAP provider totals the gross income and divides by 13 (the number of weeks in the 90-day period). This provides an average weekly gross income, which the provider uses as representative.

The HAP provider then multiplies the representative week by 52 to arrive at Mr. Ames' estimated annual income. The provider uses this amount to determine Mr. Ames' income eligibility for HAP services.

The HAP provider determines that Mr. Ames' estimated annual gross income is below 200% of FPIGs, making him income eligible for services. The HAP provider maintains the income verification and the income calculations in Mr. Ames' client record, as required in the HAP I & R.

Income used to determine eligibility includes, but is not limited to:

- Wages and salaries
- Alimony
- Child Support
- The client's college or university scholarships (e.g. grants, fellowships, assistantships) less the cost of educational expenses such as tuition, books, etc.
- Dividends
- Family allotments or other regular support from an absent family or household member
- Federal Earned Income Tax Credit
- Government employee pensions
- Interest
- Net gambling or lottery winnings after taxes
- Military compensation
- Periodic receipts from estates or trusts
- Private pensions, regular insurance or annuity payments
- Profit from self-employment
- Railroad retirement
- Rental and royalties income after business expense deductions including expenses to secure the income
- Social Security(RSDI)
- SSI for both adults and children
- Strike benefits from union funds
- TANF
- Training stipends
- Unemployment compensation
- Veterans' payments
- Workers' compensation

**Child Support.** Counties may verify if the family is receiving child support payments. If the family has not received child support in the last 30 days (or maximum of 90 days), it does not count as income.

Child support payments do not count as income for the payer as long as the payer maintains current payments. If the child support is not already deducted from the paycheck, the provider will deduct the amount of the verified payments from the income prior to calculating an annual estimate.

Income **DOES NOT** include:

- The value of real and personal property, capital gains, a house, a car, or gifts.
- Non-cash benefits such as –
  - Employer or union-paid portion of health insurance or other employee fringe benefits.
  - Food or housing received in lieu of wages.
  - The value of food and fuel produced and consumed on farms.
  - The imputed value of rent from owner occupied non-farm or farm housing.
- The imputed value of non-cash benefit programs such as medicare, medicaid, food stamps, school lunches, LIHEAP, and housing assistance.

**Calculating Income from Self-Employment.** When an applicant is self-employed, the profit from self-employment counts as gross earned income. An individual is self-employed when he or she owns and operates his or her own business, trade, or profession. Examples of self-employment include day care provider, hair stylist, nail technician, mowing lawns, shoveling snow, selling Avon products, selling produce, and renting a room in one's home.

Use the best information available to estimate the income the applicant expects to receive from self-employment. The HAP provider may base the estimate on prior earnings, if it correctly represents the self-employment income, or the provider may use income tax returns and other records.

To determine profit from self-employment:

- Total the prior earnings or the income from the tax returns or other records.
- Deduct any **allowable costs** of producing self-employment income.
- Divide the result by the number of months the income is expected to cover and use that as the representative month.

**Allowable costs** of producing self-employment income are the day-to-day expenses of operating a business, but not the costs of establishing or improving a business. If the applicant does not provide verification of the allowable cost, compute profit without the deduction.

Examples of allowable costs:

- Costs of maintaining a place of business such as rent, utilities, insurance on the business and its property, and property taxes.
- Interest on the purchase of income-producing equipment and property.
- Employee labor costs.
- Cost of goods sold, supplies, and materials.
- Advertising costs.
- Accounting and legal fees.
- Professional licensing fees and union dues, if necessary to practice a profession or trade; and
- Transportation costs necessary to produce income.

**EXAMPLE:** Mr. Ames is a repairperson who works year round. His income tax return shows total gross receipts of \$9000 for the past 12 months, although he had no earnings for the month of April due to not having worked at that time. His allowable deductions for expenses total \$3000. Mr. Ames' monthly profit is \$500 ( $\$9000 - \$3000 = \$6000$  divided by 12 = \$500).

## **B. RESOURCES**

**HAP providers must also consider readily accessible resources in determining whether the client has sufficient funds to resolve the housing crisis.** Even if an applicant meets income eligibility for HAP, if he or she has readily accessible resources that can resolve or contribute to resolving the crisis, the provider must consider this resource when determining final eligibility. Counties may create their own forms for documenting the resources the provider considers; however, the provider must maintain the rationale for all determinations and the calculations in the case record (see Appendix I for a sample Resource Calculation Worksheet). Self-declaration by the client is acceptable when making this determination, but the provider must note this discussion in the case record.

**Readily accessible resources** include, but are not limited to:

- Cash
- Bank accounts
- Income tax returns
- Savings bonds
- Stock certificates
- Other liquid assets available to the family within 24 hours or, not later than 72 hours, if conversion is delayed by a weekend or holiday.

Readily available resources **do not include** those that, if liquidated, will cause undue hardship or will be sold for less than fair market value within the time necessary to help resolve the housing crisis. Examples of this would be a Christmas club, a 401K, certificates of deposit, etc.

Readily available resources should, whenever necessary, be combined with other sources of financial assistance to resolve the housing crisis. Other sources of assistance may be from another household member, church groups, American Red Cross, local disaster aid, United Way organizations, FEMA or a similar agency.

### **C. AFFORDABILITY**

Once the HAP provider determines that the applicant is income eligible and does not have readily accessible resources to resolve the emergency, the provider must now determine if the client can afford any ongoing costs associated with the HAP service he or she will receive. For example, if an applicant requests rental assistance for an apartment that will cost \$800 a month, but the applicant has only \$500 a month of available income, the apartment is not affordable for the applicant.

HAP requires providers to consider affordability when determining eligibility so we do not place the client in a housing situation that is unsustainable and simply prolongs housing insecurity. Additionally, because there is a limit on the HAP funds an individual can receive in a 24-month period, the client will not be eligible for further funding to rectify another housing loss precipitated by unaffordable housing.

When determining affordability, the provider should consider the cost of

shelter compared to the cost of bills, utilities, and daily living expenses to determine if providing the HAP service will place the applicant in a stable situation or if it will create a financial burden. Counties may create their own forms and criteria for affordability; however, the provider must maintain the rationale and the calculations for all determinations in the case record (see Appendix I for a sample Affordability Worksheet).

## **VII. CLIENT APPEALS**

The county must develop procedures that allow clients to appeal denied assistance or terminated services and afford them the opportunity to have their cases reviewed by the county agency. At the time of intake, counties **MUST** inform clients, in writing, of their right to appeal and of the availability of a review process at the county and state levels. Counties must provide all decisions resulting from a county appeal to the client and the service provider, in writing. The client is not entitled to, but may receive, service during the time of review.

For state-funded components, the first level of appeal is the county; however, the client has the right to also appeal to the DHS Office of Hearings and Appeals concurrently.

For program components using federal funding, the first appeal level is the DHS Office of Hearings and Appeals, P.O. Box 2675, Harrisburg, Pennsylvania 17105. County allocation letters indicate whether county HAP receives state and/or federal funding.

The service provider must provide the following information in writing to any client whom it denies or terminates from service:

- The action being taken;
- The reason for the action;
- The effective date of the action; and,

- The availability of an appeal process at the county and state levels.

The county must make every attempt to provide a warning or advance notice of termination, when possible, and to assist in finding alternative shelter for clients.

**Counties must submit copies of both county and state level appeals at the time of resolution to:**

**Ingrid Santiago  
Homeless Assistance Program  
Office of Income Maintenance  
P.O. Box 2675  
Harrisburg, Pennsylvania 17105-2675**

## **VIII. WAIVER REQUESTS**

A county may submit to the department a written request for a waiver of any HAP guideline or requirement contained in these Instructions and Requirements. The county waiver request must contain:

- Justification for the request;
- A citation of the requirement the county would like the department to waive; and,
- The alternative proposed as a substitute for the waived requirement.

The department considers the following factors when reviewing waiver requests:

- Administrative efficiency;
- Health and safety of clients;
- If the request fosters client self-sufficiency; and,
- If the request is consistent with HAP objectives.

The DHS OIM will review the request and provide a written decision to the county within 30 days.

The county must keep a record of all waivers granted by the department with the appropriate fiscal year grant document to avoid audit exceptions.

**Submit waiver requests in writing to the Homeless Assistance Program Manager:**

[irivera@pa.gov](mailto:irivera@pa.gov)

**OR**

**Ingrid Santiago  
Homeless Assistance Program  
Office of Income Maintenance  
P.O. Box 2675  
Harrisburg, Pennsylvania 17105-2675**

## **IX. PROGRAM MONITORING**

Counties that subcontract with other agencies are required to monitor each service providers' compliance with HAP requirements as reflected in the HAP I & R. The county must maintain written monitoring reports at the county office. The reports must identify any programmatic or administrative issues that the service provider must resolve and the service provider's plan for resolution and follow-up. These reports are subject to review by DHS, Auditor General, federal auditors, and other persons authorized by the department. At a minimum, counties must complete monitoring reviews and written reports at least once every 12 months. Counties may develop their own monitoring strategies; however, a monitoring report should include:

- The date/s of monitoring
- Who completed monitoring
- What the monitor reviewed and at which sites (if multiple provider sites)
- A sampling methodology for reviewing client records
- The monitor's findings, including any required corrective actions and the required completion dates for the corrective actions
- A copy of the provider's notification of findings
- Evidence that the county ensured that the provider completed the corrective actions

The department will periodically monitor counties receiving HAP funds to ensure they and their subcontractors are following HAP requirements as outlined in the HAP I & R. The department's monitoring objectives are:

- Review for compliance with HAP requirements, including program requirements and client eligibility.
- Represent the state in state/county partnership.
- Build a collaborative relationship between the state and HAP county contacts and become a mutually beneficial team with the common goal of providing quality services to the clients of Pennsylvania.

- Clarify program expectations.
- Support county initiatives and innovations.
- Provide any support needed.
- Discover county “best practices” in order to be able to share ideas with counties.
- Encourage networking amongst counties.

During a HAP monitoring visit, the HAP Program Manager will review client files, HAP services and programs, and subcontractor sites. During a HAP monitoring visit, counties can expect:

- A review of HAP Paperwork, including -
  - HAP intake forms
  - Client applications
  - Client notes
  - Contracts
  - Client files
- A review of HAP Services, including –
  - Program measures
  - Monitoring tools
  - Encumbrance reports
- Visit at least one program funded by HAP in each component
  - Tour the facilities
  - Speak with program director

- Review performance measures and outcomes
- Review any paperwork regarding HAP
- Review client files
- Interview clients
- Review treatment plans
- Review goals
- Review progress documentation

Note: Since the county is responsible to monitor the compliance of each of their service providers, the HAP Program Manager will provide oversight of county monitoring of the service providers.

To schedule a monitoring visit, the Homeless Assistance Program Manager will contact the HAP county contact person, explain the purpose of the visit, and explain who should participate in the monitoring visit. Once agreeing upon a date and time, the HAP Program Manager will send written confirmation of the meeting date, time, and place and a copy of the HAP monitoring review form describing what will occur during the visit. The duration of the HAP visit depends on the size of the county and use of subcontractors.

Once the HAP county monitoring visit is complete, the HAP Program Manager will conduct an exit interview with a member of the county agency staff. The purpose of the exit interview is to:

- Identify areas of strength and the areas that need improvement.
- Discuss the findings and give suggestions on changes that should occur.
- Get input from county staff.
- Ask if there are any questions or concerns.
- Review the findings and recommendations.
- Discuss any discrepancies.

- Explain that a letter and draft report will follow and will allow for input from the county.

The HAP Program Manager will send a cover letter and draft HAP monitoring review report to the HAP county contact person. The HAP Program Manager prepares HAP monitoring review report. The HAP Human Services Program Supervisor reviews and finalizes the report. The DHS Bureau of Policy Director signs the attached reporting letter.

The county has 30 days to comment or, if necessary, provide a corrective action plan. If the county provides comments, the HAP Program Manager will incorporate them into the final monitoring report. If the county provides a corrective action plan, the HAP Program Manager will revisit the county, ensure that the county has implemented the corrective actions, and incorporate the findings into the final monitoring report.

The department sends a cover letter addressed from the Bureau of Policy Director to the County Commissioners, with the final monitoring report attached. The HAP county contact person also receives a copy.

**APPENDIX A  
EVALUATING PROGRAM PROCESSES AND OUTCOMES  
FOR CONTINUOUS QUALITY IMPROVEMENT**

## **Evaluating Program Processes and Outcomes For Continuous Quality Improvement**

The introduction of the Human Services Block Grant (HSBG) presents HAP providers with exciting challenges. In each subsequent year following the implementation of the HSBG, HSBG counties can reallocate increasing percentages of the HSBG funds among the seven human services programs. While residents' needs will influence how counties allocate the HSBG funds, programs that demonstrate success will have greater credibility when justifying continued or increased funding.

The department recommends that counties develop and build an evaluation component into their Homeless Assistance Programs. Evaluation allows the county to identify and sustain what works, modify what does not work, and continuously improve the quality of the program.

Some counties already evaluate program processes and measure outcomes for quality improvement. The department urges counties that do not to develop and put in place an evaluation process. Counties are free to choose from among the array of program evaluation tools available in scholarly journals, in books, or online. The United Way provides several examples of using the Logic Model for measuring program outcomes, including one found at: [http://www.nrpa.org/uploadedFiles/nrpa.org/Professional\\_Development/Accreditation/COAPRT/Measuring\\_Program\\_Outcomes-UW.pdf](http://www.nrpa.org/uploadedFiles/nrpa.org/Professional_Development/Accreditation/COAPRT/Measuring_Program_Outcomes-UW.pdf).

The department has provided some very simple program evaluation strategies below to help counties get started.

### **Identify Needs/Resources**

Evaluation involves understanding the program's place in the community. It is important to examine the existing resources in a local area and think about how the program can tap these assets to meet the needs of families experiencing or at risk for homelessness. Even collecting very basic information can help a program shape its services. Some questions to ask include: What are the needs of families experiencing or at risk for experiencing homelessness in the community you serve? What resources are already available to meet these needs? How can you fill gaps or collaborate with other agencies to improve existing services? What does your funding and staff level allow?

## Develop Goals/Objectives

In order to evaluate its success in achieving outcomes, a program must identify and clearly state its goals and desired outcomes. Clearly articulating goals and desired outcomes also guides the program's direction and the services a program offers should link back to the outcomes program wants to achieve. To identify program goals and objectives, ask:

- ✓ What is our program trying to accomplish?
  - ✓ What are the desired results?
  - ✓ How would we like the conditions to change?
- Goals reflect what impacts you hope to achieve in the future. Goal statements provide the overall direction of the program and state what is to be accomplished. They provide the foundation for specific objectives and activities that will ultimately define the program.
  - Objectives are the changes that you want to occur as a result of the program. For example, objectives may be related to changes in:

**Knowledge** - What people learn or know about a topic (e.g., how savings accounts work, how to use the Internet to locate resources)

**Skills** - Skill development (e.g., resume writing, interviewing, job searching, money management)

**Behaviors** - Changes in behavior (e.g., paying rent timely, increased participation in employment or education)

**Condition** - Changes in basic living status (e.g., temporary to permanent housing, housing insecurity to stable bridge housing)

An objective should:

- Be specific and measurable.
- Specify what will change (e.g., knowledge, skills, attitudes, behaviors) and –
  - For whom (e.g., enrolled homeless Veterans).

- By how much (e.g., average income will increase to 200% of poverty level, stays in homeless shelters will be reduced by 50%).
- By when (e.g., by the end of your program, at a six-month follow-up).
- Logically link to and support attainment of the stated goal(s). There is likely to be more than one objective for each goal.

Program evaluation involves systematically examining the level to which a program is achieving its objectives (in the short term) and its goals (in the long term). Programs do that by collecting program data – the program’s outputs - related to the objectives. This provides information on outcomes – the difference that the program makes in the lives of the people it serves. Programs use outcomes for program development and quality improvement.

### **Evaluate Processes and Outcomes**

Counties should evaluate their HAPs in terms of both process and outcomes.

- **Process evaluations** look at the quality of program implementation and its fidelity to the program goals. Evaluating program processes involves finding out how well the program works on a daily basis and if it remains true to the stated program goals. One of the best ways to do this is to ask. Counties can use strategies like convening focus groups, conducting client satisfaction surveys, and interviewing employees. The evaluator uses the findings to recommend modifications to program implementation.
- **Outcome evaluations** look at how well the program worked in meeting identified objectives. Evaluating program outcomes involves assessing the level to which the program meets its identified objectives. Stating objectives clearly and in measurable terms will help the program evaluate the extent to which it attains desired outcomes.

**APPENDIX B  
SERVICE PLANS**

## **SERVICE PLANS**

The case management component should include preparation of assessment-based service plans with specific, attainable, measurable objectives developed in cooperation with and signed by the client. The service plan should be a clear and specific guide for the caseworker and the family to the steps that they will take to retain or obtain housing and become self-sufficient. Case managers can create assessment-based service plans with measurable objectives by making them SMART:

**S**pecific. The client and case manager should know exactly what has to be done and why.

**M**easurable. Everyone should know when the goals have been achieved.

**A**chievable. The client should be able to accomplish the goals in a reasonable time period.

**R**ealistic. The family should have input and agreement in developing goals.

**T**ime bound. Time frames for accomplishing goals should be determined based on an understanding of the family's risks, strengths, and ability and motivation to change.

Case managers can follow these steps to create SMART service plans:

- Identify objectives that, combined, will help the client retain or obtain housing and become self-sufficient. For example, one of a client's objectives may be finding an affordable apartment. To find an affordable apartment, the client must determine an affordable amount for rent, find an appropriate neighborhood to search in, make appointments with property owners to view apartments, etc. These are the client's objectives.
- Rank the priorities among the objectives, goals, and tasks. For example, household budgeting and determining affordability must occur before the client can contact property owners to view apartments.
- Establish benchmarks for each goal and task that measures client progress for achieving objectives. For example, the case manager and the client will set a date for completing the household budget. They also agree that viewing two apartments daily for five days meets the goal of making appointments with property owners to view apartments.

- Name the outcomes that, when achieved, will indicate that the client has completed his or her objectives. For example, when the client is living in an affordable apartment, he or she will have met that objective.

**APPENDIX C  
FEDERAL POVERTY INCOME GUIDELINES**

**UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES  
2014 POVERTY GUIDELINES**

Size of Family or Budget Group Unit	Poverty 100%		Poverty 125%		Poverty 150%		Poverty 200%	
	Annual	Mo.	Annual	Mo.	Annual	Mo.	Annual	Mo.
1	\$11,670	\$973	\$14,588	\$1,216	\$17,505	\$1,459	\$23,340	\$1,945
2	\$15,730	\$1,311	\$19,663	\$1,639	\$23,595	\$1,967	\$31,460	\$2,622
3	\$19,790	\$1,650	\$24,738	\$2,062	\$29,685	\$2,474	\$39,580	\$3,299
4	\$23,850	\$1,988	\$29,813	\$2,485	\$35,775	\$2,982	\$47,700	\$3,975
5	\$27,910	\$2,326	\$34,888	\$2,908	\$41,865	\$3,489	\$55,820	\$4,652
6	\$31,970	\$2,665	\$39,963	\$3,331	\$47,995	\$4,000	\$63,940	\$5,329
7	\$36,030	\$3,003	\$45,038	\$3,754	\$54,045	\$4,504	\$72,060	\$6,005
8	\$40,090	\$3,341	\$50,113	\$4,177	\$60,135	\$5,012	\$80,180	\$6,682
For family or budget groups with more than 8 members, add for each additional member.	\$4,060	\$339	\$5,075	\$423	\$6,090	\$508	\$8,120	\$677

**APPENDIX D**  
**Rental Assistance Tracking Form**



**APPENDIX E**  
**COORDINATION WITH TITLE IV-A EMERGENCY SHELTER**  
**ASSISTANCE PROGRAM**

## **COORDINATION OF RENTAL ASSISTANCE PAYMENTS WITH THE TITLE IV-A EMERGENCY SHELTER ASSISTANCE PROGRAM**

The DHS Office of Income Maintenance administers the Title IV-A Emergency Shelter Allowance (ESA) Program through local County Assistance Offices (CAO). This program provides payments for emergency housing needs. Some clients may also be eligible for Rental Assistance services through the HAP. Rental payments to these clients should be coordinated with the CAO in the manner described below.

- 1. Rental Assistance Referrals to the CAO.** Some individuals or families who contact the Rental Assistance agency to request financial assistance to address emergency housing needs may be eligible for the Title IV-A Emergency Shelter Allowance (ESA) program. ESA is an entitlement program administered by the CAOs.

The Rental Assistance agency should refer all individuals under the age of 21 or families with children under the age of 21 who receive any amount of TANF or cash assistance from DHS to the local CAO to apply for an ESA.

All other individuals or families, that appear to be eligible for ESA, must be referred to the local CAO before applying for assistance from HAP. HAP is the assistance of last resort.

- 2. Determining who to refer to the CAO.** Ask each individual or family who requests funds from the Rental Assistance agency to resolve a housing emergency the following two questions:
  - a. Are you under the age of 21 or do you have a child living with you who is under the age of 21?**
  - b. Is your income below 80 percent of FPIG income limit for the family size?**

If the answer to both of these questions is "yes," refer the individual or family to the CAO to be considered for an ESA.

If the answer to one or both of these questions is "no" the individual or family may apply for rental assistance services without first applying for ESA at the CAO.

**3. Coordination of Rental Assistance agency and CAO services.** In some cases, the maximum ESA payment will not be enough to resolve the applicant's housing emergency. The CAOs have been instructed, in such cases, to contact the Rental Assistance agency and arrange, if possible, for the ESA payment to be combined with available Rental Assistance funds in order to provide the individual or family with the amount of funds needed.

Each CAO is required to have a designated ESA coordinator. The ESA coordinator is responsible for contacting the Rental Assistance agency and arranging for ESA payments to be combined with available Rental Assistance funds in cases where an ESA applicant needs more than the maximum ESA payment to resolve the emergency housing need.

In these cases, the ESA coordinator or their designee will contact the Rental Assistance agency by telephone (or other expedient method, such as by FAX, if a telephone contact cannot be made) and advise the Rental Assistance agency that the applicant individual or family is eligible for ESA, but requires more than the maximum ESA payment to resolve the emergency. The Rental Assistance agency will first check its records to see whether the ESA applicant has received a Rental Assistance payment within the preceding 24 months. If not, the Rental Assistance agency will consider the ESA eligible individual or family to be automatically eligible for a Rental Assistance voucher, subject to the availability of funds, up to the difference between the maximum ESA payment and the maximum Rental Assistance grant.

**EXAMPLE:** A homeless family meets the eligibility conditions for an ESA payment to provide permanent housing. However, the amount needed for the first month's rent and security deposit is \$600, which exceeds the maximum ESA payment of \$300.

The ESA coordinator contacts the Rental Assistance agency by telephone and requests the Rental Assistance agency to issue a Rental Assistance voucher to the family for the additional \$300 required to resolve the applicant's emergency housing need.

The Rental Assistance agency will check its records to see whether the family has received a rental assistance payment within the preceding 24 months. If not, the family is automatically eligible for the Rental Assistance program. Assuming the funds are available, the Rental Assistance agency will immediately issue a voucher for \$300. **See Cash Assistance Handbook, Emergency Shelter Allowances, Section 138.961, Pages 138-47.**

**APPENDIX F  
KEY DATES**

- JULY 1** County begins operation of the HAP in accordance with the approved plan.
- JULY 31** Annual Client Data Report due for previous fiscal year.
- JANUARY 15** Deadline date to request supplemental funds.
- JUNE 1** Deadline date to request budget revisions.

**APPENDIX G**  
**Client Records**

## **Client Records**

The provider must maintain records that consider client confidentiality, but which share information that benefits the client. Counties and providers should consider the populations they serve and understand the risks and implications for particular clients if confidentiality is breached (e.g. when serving people experiencing both homelessness and domestic violence, the service provider must be cognizant of the risks facing the client and not allow breaches of confidentiality to place the person at increased risk).

Service providers may choose the format for their client records. At a minimum, client records must contain:

- Releases of information.
- Copies of client ID, SS card, and other proofs of identification.
- Intake and assessment forms.
- Acknowledgements of rules and regulations, rights and responsibilities, appeal process, etc.
- Service Plans.
- Referral form.
- Proofs of income and resources.
- Verifications provided demonstrating need for services (e.g. eviction notices, leases, bills, utility termination notices, etc.)
- Calculation worksheets used to determine eligibility and amount of assistance (e.g. rent disposition work sheet).
- The amounts and dates of assistance.
- Case notes.
- Approval or denial notices.

- Any document specific to a client’s participation in a particular component.

In this example of a client record, the provider divided the record into four sections. Each section includes the following:

<b>SECTION 1: Client Information</b>	<b>SECTION 2: Housing Information</b>	<b>SECTION 3: Service Plan</b>	<b>SECTION 4: Financial</b>
Releases	Landlord letter	Notes/Correspondence	Budget sheet
HMIS Form	Billing forms	Intake forms	Defined resources
HIPPA form	Landlord information	Entry Assessment	Income verification
Appeal Form	W9 form	HAP criteria	Proof of income (90 days)
ID, SSN, etc.	Responsibilities form	Needs sheet	Bills (one month)
	Eviction notice		Taxes
	Lease		Bank statement

**APPENDIX H  
ANNUAL CLIENT DATA REPORT**

## **Annual Client Data Reporting**

The Annual Client Data Report for all HAP components is due to the department by July 31<sup>st</sup>.

**The report should contain unduplicated annual figures.** Submit one copy of the Client Data Report, electronically, to Ingrid Santiago at [irivera@pa.gov](mailto:irivera@pa.gov)

## **HOMELESS ASSISTANCE PROGRAM ANNUAL CLIENT DATA REPORT INSTRUCTIONS**

Counties must use this form to report annual service component activities for all clients served year-to-date. Counties are required to submit a **county summary** reflecting the number of clients served by all of its HAP service providers. The county must retain the providers' reports. The annual client data report is due to DHS by July 31<sup>st</sup>. The report should contain unduplicated annual client figures.

### **Definitions:**

**Unduplicated:** A new client served in any HAP service component during the fiscal year.

**Adults:** A person who is 18 years of age and older.

**Children:** A person who is 17 years of age and younger.

**Household :** One or more related or unrelated individuals who occupy or, in the case of homeless persons, intend to occupy a common residence and whose income and resources are to be considered together in determining eligibility and payment level for assistance.

**Unit of Service:** A unit of service = one night for one person in either mass or individual shelters.

**County** - Enter the name of the county submitting the report.

**Fiscal Year** – Enter the fiscal year for report.

**Prepared by** – Enter the name of the person who completed the report.

**Title** – Enter the title of the person who completed the report form.

**Date** – Enter the date the form was completed.

### **HOUSEHOLDS WITH CHILDREN**

**A. 1. Total number of unduplicated families with children served during fiscal year** - Enter the number of new families with children served. If time is spent completing an intake/assessment, the client(s) should be counted as "served". **On the report, be sure to include families served in the previous fiscal year who continued to receive HAP services in the new fiscal year.**

**A. 2. Of the total in "A.1." how many were adults** - Enter the number of clients served who are 18 years of age and older. Also include those who are emancipated (17 years of age and younger who are married or separated from a spouse and have children). **This number must be equal to or greater than the number in**

**A. 3. Of the total in "A.1." how many were children** - Enter the number of children served who are 17 years of age and younger and are part of a family.

**This number must be equal to or greater than the number in A.1.**

### **ADULT-ONLY HOUSEHOLDS**

**B. 1. Total number of unduplicated adult-only households (with one or more adults) served year-to-date** - Enter the number of new households (with one or more adults and no children 17 years of age and younger) served. If an intake/assessment is completed, the client(s) should be counted as "served". ***On the report, be sure to include clients served in the previous fiscal year who continued to receive HAP services in the new fiscal year.*** For example, in May 2012, a family is determined eligible for \$1,200 to resolve a housing crisis. The provider will assist the client with \$300 monthly payments over the next four months. The client receives a payment in May and June and is counted on the client reporting form during the previous fiscal year. The July and August payments to the client will be paid from new fiscal year funds. Therefore, the client should also be counted on the client reporting form for the new fiscal year.

**B. 2. Of the total number of unduplicated adult-only households, what was the number of adults who resided in these households** - Enter the total number of adults who resided in the households served. **This number must be equal to or greater than the number in B.1.**

**B.3. Of the total in B1, how many adults were age 59 years and younger?**

**B.4. Of the total in B1, how many adults were age 60 years and older?**

### **UNDUPLICATED ADULTS**

**C. 1. Total number of unduplicated adults served during current fiscal year (A.2 + B.2 )** - Enter the total (sum of "A.2." plus "B.2"). This must equal the total number of Adults served during the report period.

**C. 2. Of the total in C.1. how many were veterans** - Enter the total number of adults served who identify themselves as veterans.

**C. 3. Of the total in C.1. how many unduplicated adults were referred to or from your agency or are currently receiving MH services** - Enter the total number of unduplicated adults served who, by their own admission or your knowledge, based on a clinical diagnosis, are currently receiving Mental Health (MH) services from another provider agency or from your agency. Also include in your count those clients who are referred to your agency by the MH system, those clients you are referring to the MH system, those who are self-referrals to your agency, those who are referred via the informal network such

as; a neighbor, workmate, prior MH client, etc., and those MH clients who obviously have MH issues, and have a clinical diagnosis but **are not** currently receiving MH services. ***This information does not need to be documented in the clients file.***

**C. 4. Of the total in C.1. how many unduplicated adults were referred to or from your agency or are currently receiving D&A services** – Enter the total number of unduplicated adults served who, by their own admission or your knowledge, based on a clinical diagnosis, are currently receiving Drug and Alcohol (D&A) services from another provider agency or from your agency. Also include in your count those clients who are referred to your agency by the D&A system, those clients that you are referring to the D&A system, those D&A clients who are self-referrals to your agency, those D&A clients who are referred via the informal network such as a neighbor, workmate, prior D&A client, etc., and those D&A clients who obviously have D&A issues, and have a clinical diagnosis but **are not** currently receiving D&A services. ***This information does not need to be documented in the clients file.***

**C. 5. Of the total in C.1. how many unduplicated adults were referred to or from or are currently receiving Domestic Violence services**– Enter the total number of unduplicated adults served who, by their own admission, or your knowledge are currently receiving Domestic Violence (DV) services from another provider agency or from your agency. Also include those clients referred to your agency by DV services, those you are referring to DV services, those receiving DV services from your agency, those clients who are self-referrals to your agency, and those DV clients referred via the informal network such as; neighbor, workmate, prior DV victim, etc. ***This information does not need to be documented in the clients file.***

**C. 6. Of the total number of adults served in “C.1.” how many were employed at the point of intake?** - Enter the total number of unduplicated adults served that were employed at the point of intake. Employed is defined as working full or part time. Include adults who are fulfilling their TANF work requirements (working or volunteering 20 hours or more per week).

**C. 7. Of the total in C.1. how many received Rental Assistance for more than one housing crisis during their 24-month period** – Enter the total number of adults that received more than one HAP Rental Assistance payment, ***for more than one housing crisis***, during their 24-month period. For example, the county’s maximum for families with children is set at \$1,200 during a 24-month period. The client receives \$800 for first month rent and security deposit. Four months later, the client returns and needs \$400 to prevent an eviction. This client has received more than one payment for more than one housing crisis during the 24-month period. Do NOT include those clients that receive incremental payments to resolve a single crisis.

**C. 8. Of the total in C.1. how many clients received a combined Rental Assistance/ESA payment?** – Enter the total number of adults that received funding from both the HAP’s Rental Assistance component and the County Assistance Office Emergency Shelter Assistance program in order to resolve their current housing crisis.

**C.9 Of the total in C1, how many adults received a combined Rental Assistance/ESA payment?**

**UNDUPLICATED ADULTS & CHILDREN**

**D. Total number of unduplicated adults & children served during fiscal year (A.2.+A.3.+B.2.)**

Enter the sum of A.2.+A.3.+B.2., this should equal the total number of adults and children served during the report period.

**E. Total number of adults and children who were denied services due to lack of funding** - Enter the total number of unduplicated adults and children who were denied HAP services solely due to a lack of available funding. These clients may or may not be on a waiting list for services.

**F. The total number of adults and children for which eviction was resolved (near - homeless served)** - Enter the total number of unduplicated adults and children for which eviction was resolved either by maintaining the client in their current residence or moving the client to a new residence in the Rental Assistance component. This will be the number of near homeless served during current fiscal year.

**G. The total number of adults and children served who were homeless. (Homeless served)** - Enter the total number of unduplicated adults and children served in the Rental Assistance and Case Management components who were homeless.

**H. Total units of service provided in Mass and Individual Shelters** - Enter the total number of units provided in both mass and individual shelters. **One unit equals one night for one person.**

**Please submit one copy of the Client Data Report via email to [irivera@pa.gov](mailto:irivera@pa.gov)**

<b>HOMELESS ASSISTANCE PROGRAM</b>	Prepared by:				
<b>FINAL REPORT</b>	Title:				
<b>Fiscal Year: 2013-2014</b>	Date:				
	County:		County Number:		

		Bridge Housing	Case Management	Rental Assistance	Emergency Shelter	Innovative Supportive Housing Services	TOTAL NUMBER SERVED ACROSS HAP COMPONENTS - UNDUPLICATED (Column C + D + E + F + G unduplicated)
A1	Total number of unduplicated families with children served year-to-date.						
A2	Of the total in A1, how many were adults? <b>Total Adults cannot be less than the total families in A1</b>						
A3	Of the total in A1, how many were children?						
B1	Total number of unduplicated adult-only households (one or more adults) served.						
B2	Of the total in B1, how many adults resided in these households?						
B3	Of the total in B1, how many adults were age 59 years and younger?						
B4	Of the total in B1, how many adults were age 60 years and older?						
C1	Total number of unduplicated adults served year-to-date (A2+B2).						
C2	Of the total in C1, how many were veterans?						
C3	Of the total in C1, how many unduplicated adults were referred to or from your agency or are currently receiving MH services?						
C4	Of the total in C1, how many unduplicated adults were referred to or from your agency or are currently receiving D&A services?						
C5	Of the total in C1, how many unduplicated adults were referred to or from your agency or are currently receiving Domestic Violence services?						
C6	Of the total in C1, how many were employed at the point of intake?						
C7	Of the total in C1, how many who were not employed at intake were employed when exiting services?						
C8	Of the total in C1, how many adults received Rental Assistance for more than one housing crisis during their 24-month period?						
C9	Of the total in C1, how many adults received a combined Rental Assistance/ESA payment?						
D	Total number of unduplicated adults & children served year-to-date (A2+A3+B2).						
E	Total number of adults and children denied services due to lack of funding.						
F	Total number of adults & children for which eviction was resolved (near-homeless served).						
G	Total number of adults and children served who were homeless (homeless served).						
H	Total units of service provided in Mass and Individual Shelters.						

**APPENDIX I  
INCOME, RESOURCES, AND AFFORDABILITY  
CALCULATION WORKSHEETS**

**EXAMPLE INCOME COMPUTATION WORKSHEETS** – Counties may create their own worksheets; however, they must show time period covered, sources of income, payment dates, gross amounts, calculations, and eligibility determination.

HAP INCOME COMPUTATION WORKSHEET

INCOME GOING BACK 30 DAYS

APPLICANT/ADULT MEMBER NAME	APPLICATION SIGNED DATE	START DATE	END DATE

HH MEMBER:			HH MEMBER:		
SOURCE	PAID DATE	GROSS AMOUNT	SOURCE	PAID DATE	GROSS AMOUNT

Total \$ Amount: \_\_\_\_\_

Total \$ Amount: \_\_\_\_\_

HH MEMBER:			HH MEMBER:		
SOURCE	PAID DATE	GROSS AMOUNT	SOURCE	PAID DATE	GROSS AMOUNT

Total \$ Amount: \_\_\_\_\_

Total \$ Amount: \_\_\_\_\_

**Grand Total All Household Members' Gross Income \$** \_\_\_\_\_

Grand Total \$ \_\_\_\_\_ ÷ number of weeks in pay period \_\_\_\_\_ = Representative Week \$ \_\_\_\_\_

Representative Week \$ \_\_\_\_\_ x 4.33 = Estimated Monthly Gross Income \$ \_\_\_\_\_

Representative Week \$ \_\_\_\_\_ x 52 weeks = Estimated Annual Gross Income \$ \_\_\_\_\_

Family Size \_\_\_\_\_ Monthly Income Limit \_\_\_\_\_ Annual Income Limit \_\_\_\_\_

Income Eligible?      Yes      No

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_



**EXAMPLE – RESOURCE COMPUTATION WORKSHEET –** County versions must include the elements shown in the example.

HAP RESOURCE COMPUTATION WORKSHEET

READILY AVAILABLE RESOURCE	VALUE
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$
<b>TOTAL VALUE OF ALL RESOURCES: \$</b>	

The amount available to assist with current crisis \$ \_\_\_\_\_

Are readily available resources sufficient to resolve housing crisis? Yes No

Is the applicant income eligible? Yes No

Client signature: \_\_\_\_\_ Date: \_\_\_\_\_

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_

**EXAMPLE 1 - AFFORDABILITY WORKSHEET** – Counties may create their own Affordability Worksheets or use one of these two examples:

HAP AFFORDABILITY WORKSHEET

Gross Monthly Income (Representative Week x 4.33) \$ _____ X .8 = Affordability Income \$ _____
--

HOUSING COSTS	
RENT	\$
ELECTRIC	\$
GAS	\$
OIL/PROPANE	\$
WATER	\$
SEWER/TRASH	\$
HOMEOWNERS/RENTERS INSURANCE	\$
CHILDCARE	\$
AUTO LOANS/INSURANCE	\$
AUTO REPAIRS AND GAS	\$
CLOTHING	\$
FOOD	\$
HEALTH INSURANCE	\$
PERSONAL CARE	\$
COURT FEES	\$
CHILD SUPPORT PAID	\$
OTHER	\$

AFFORDABILITY INCOME:\$
TOTAL HOUSING COST:\$

Affordable?    Yes    No

Client signature: \_\_\_\_\_ Date: \_\_\_\_\_

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_

## EXAMPLE 2 – AFFORDABILITY WORKSHEET

NAME \_\_\_\_\_ DATE COMPLETED \_\_\_\_\_

### MONTHLY LIVING EXPENSES

(MEDICAL EXPENSES ARE OUT OF POCKET. WEEKLY, BI-WEEKLY OR QUARTERLY BILLS, GIVE MONTHLY AVERAGE)

EXPENSE	AMOUNT	COMMENTS	EXPENSE	AMOUNT	COMMENTS
MORTGAGE/RENT	\$		MEDICAL/RX	\$	
FOOD	\$	FS-food stamps \$	MEDICAL/RX	\$	
TOILETRIES	\$		MEDICAL/RX	\$	
ELECTRIC	\$		LOAN	\$	
GAS	\$		LOAN	\$	
FUEL (OIL, KEROSENE, WOOD)	\$		CREDIT CARD	\$	
TRASH	\$		CREDIT CARD	\$	
WATER/SEWER	\$		CREDIT CARD	\$	
PHONE(landline)	\$		LAYAWAYS	\$	
CELL PHONE/PAGER	\$		RENT TO OWN	\$	
INTERNET	\$		MEALS OUT	\$	
CABLE/SATELLITE	\$		LAUNDRY	\$	
BUS/TRANSPORTATION	\$		CIGARETTES	\$	
CAR PAYMENT	\$		PETS (FOOD, ETC.)	\$	
GAS FOR CAR	\$		FINES/LEGAL FEES	\$	
CAR INSURANCE	\$		CHILD CARE	\$	
LIFE INSURANCE	\$		CHILD SUPPORT	\$	
RENTERS INSURANCE	\$		DIAPERS, WIPES, ETC	\$	
HOME OWNERS INS.	\$		STORAGE	\$	
OTHER INSURANCE	\$		ENTERTAINMENT	\$	
CHURCH	\$		ALCOHOL	\$	
CLOTHING	\$		SELF-CARE	\$	
TAXES	\$		OTHER	\$	

MONTHLY EXPENSES TOTAL \$ \_\_\_\_\_

NET MONTHLY INCOME \$ \_\_\_\_\_

BALANCE (Minus/Plus) \$ \_\_\_\_\_

MONTHLY EXPENSE 2014