HSU Public Comments for Pathway Home Program Proposed Rule
Before the Human Resources Administration on August 21st, 2018

1) No “wrong door”: expanding access
   a) Section 11-01 (s) “Street Homeless” definition- Amend sub-sections (1) (2) and (3) to replace “DHS contracted outreach provider” with “DHS or DYCD contracted outreach provider, or per review of documentation of services from other outreach programs”, to ensure an individual’s street homeless designation is captured for CityFHEPS eligibility regardless of which outreach programs they utilize.
   a) Section 11-03 (b) (1)- “Qualifying shelter stay” for a DHS shelter resident should be amended to:
      i) Include time spent in a DYCD Crisis Shelter or Transitional Independent Living (TIL)
      ii) Count the cumulative time spent in DHS, DYCD, and HRA shelters towards the 90 day requirement. The “clock” should not reset for a client because they transition from one type of shelter to another.
      iii) For survivors of domestic violence residing in HRA shelters, the “90 days” prior to certification requirement should be lowered to “45 days”, as HRA shelters have an initial 90-day time limit, which would necessitate them waiting until the last day to apply for housing and then either file an extension for HRA shelter or transfer to a DHS shelter.

2) Ensuring stable permanent housing
   a) Section 11-07 (a)- “service providers will help connect to appropriate services in their communities”- when deciding how best to implement this provision, HSU recommends amending effected service contracts to add additional funding if there will be anticipated increases in caseloads.