

## **HSU Public Comments for Pathway Home Program Proposed Rule**

**Before the Human Resources Administration on August 21<sup>st</sup>, 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.