Colbert and Williams Consent Decree Programs
Policies and Procedures:
Housing Search and Bridge Subsidy

Policy Number:	P4.03
Subject:	Housing Search and Bridge Subsidy
Section:	P4 Housing Phase
Scope:	Comprehensive Program, Front Door Diversion Program
Effective Date:	2/1/2020
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POLICY STATEMENT

Assisting Colbert and Williams Class Members and Front Door Diversion Program (FDDP) Participants with finding and securing housing in the geographic area of their choice is a key part of the process of transitioning from an institutional setting into the community. Receiving subsidized housing also requires specific tasks to be completed before a lease can be signed.

The Colbert and Williams housing documents and resources help Class Members, FDDP Participants, care managers, housing locators, property managers, and subsidy administrators understand and complete all necessary phases of the housing process. Care Managers and housing locators are responsible for helping Class Members and Front Door Diversion Participants to fully understand their responsibilities and rights as a tenant based on their lease and subsidy agreement.

Housing units available to Class Members and FDDP Participants include subsidized housing for people with disabilities through the U.S. Department of Housing and Urban Development (HUD) Section 811 program, as well as units through the Illinois Statewide Referral Network (SRN), Housing Choice Voucher (HCV), Housing Opportunities for Persons with AIDS (HOPWA), Senior Housing, and other local housing resources. Class Members and FDDP Participants who are unable to secure housing through those programs or through other rental assistance programs may receive rental assistance through the Bridge Subsidy.

It is the expectation that all agencies develop and follow internal operating procedures surrounding consent decree activities. However, these internal procedures must align with IDHS policies and procedures.

HOUSING SEARCH PROCEDURES

1. The Care Management Agency is responsible for obtaining background information from the participant to prepare them for the housing search. This includes information on the participant's income, credit history, justice involvement history (including sex offender status), and potential need for reasonable accommodations. The Care Management Agency must thoroughly explain the housing search process and establish clear expectations with the participant. All household members that intend to reside with the participant must be included on form 4.3 Bridge Subsidy Administrator Referral Form. If a participant requests to add a household member after the referral process is complete, the Care Management Agency must contact the Bridge Subsidy Administrator and IDHS Housing Coordination Unit at DHS.CWCDHousing@Illinois.gov.
    a. **Live in aides:** Bridge Subsidy Participants may have a related or non-related live-in aide outside of their household reside in the unit. A live-in aide provides essential care for the participant and would not be living in the unit except to provide supportive services. A live-in

aide has no rights to the unit or the voucher. Additional documentation may be requested to document the participant's need for a live-in aide.

2. The Care Management Agency **must** enter a new application for Section 811 or Statewide Referral Network housing units on behalf of the Class Member or FDDP Participant into the PAIR module, following P4.02 PAIR Module & SRN-Section 811 Waitlists. It is best practice that participants are provided an opportunity and assistance to apply for all housing waitlists available to them at program entry. The Bridge Subsidy administrators require an active SRN/811 application to be able to proceed with enrollment in the Bridge Subsidy program.
    a. When Class Members or FDDP Participants are housed in a cluster model HUD 811 unit, CSH removes their application from the PAIRS module at the time of being housed.
    b. Should the Class Member or FDDP Participant request to move from the cluster housing site, a new SRN/811 application must be added to the PAIR module.

3. Annual recertification in the PAIRS Module is required, as indicated by P4.02. Delays in annual recertification process may impact the Class Member or FDDP Participant's ability to move with the Bridge Subsidy during their annual renewal period as individuals are required to maintain their application in the PAIRS Module, at minimum, annually.

4. Should a participant receive a referral for a unit off the SRN-Section 811 waitlist before using the Bridge Subsidy, the participant is required to *apply* to the unit. If approved, the participant will be required to accept the SRN-Section 811 unit, as the participant will have secured a permanent voucher. Current Bridge Subsidy recipients must *see* the SRN-Section 811 units they are referred for prior to declining the referral.

5. If the participant will be pursuing housing using the Bridge Subsidy, the Care Management Agency must review form 4.4, the Bridge Subsidy Participation Agreement, with the participant and answer any questions before obtaining the participant's signature on the document.

6. The Care Management Agency must submit income verification to the Bridge Subsidy Administrator.
    a. The Care Management Agency must complete form 4.3 Bridge Subsidy Administrator Referral Form and submit it to the Bridge Subsidy Administrator along with income verification documentation.
    b. Income verification documentation includes a Social Security award letter, other benefit letter, proof of employment income, or proof of other financial support.
    c. If the participant is the head of a household with multiple members, the Bridge Subsidy Administrator will inform the housing locator of the maximum allowable unit size given the household's composition.
    d. If the participant or household member has no income, the Care Management Agency must complete form 4.11 Certification of Zero Income with the participant. This document asks the individual to describe their monthly income and expenses and explain how those needs are or will be met. Additional expectations for this situation are described in P4.08 Bridge Subsidy for Participants with No Income.

7. The Care Management Agency must conduct a thorough housing search with the participant.
    a. Care Management, Housing Locators, or whomever is searching for housing on behalf of the Class Member or FDDP Participant must be sure that the housing is;
        i. within the Class Member's or FDDP Participant's documented preferences as identified in the Comprehensive Service Plan (CSP) *(if applicable*). If the search is outside of their

documented geographical preference, it should be noted that Class Member or FDDP Participant agreed to expand housing search. For Class Members, this should be documented in a case note/progress note section of the WebApp.

ii. reflective of all the Class Member's or FDDP Participant's physical and functional needs. For example, the unit size must be able to accommodate the Class Member's or FDDP Participant's needed DME.

iii. reflective of the Class Members *documented,* recommended and preferred housing type as identified in their CSP:

- Permanent Supportive Housing (PSH) – Private apartment or home
- PSH – Senior Housing
- PSH - Cluster Housing
- Non PSH - Supervised Residential Setting (group home, CILA…etc)
- Non PSH - Supportive Living Program
- Non PSH - Assisted Living Program

b. When looking for a housing unit with a participant, it is important to ensure that the monthly rent, plus any utilities the tenant is required to pay, is below the HUD Fair Market Rent (FMR) value for the unit size and geographic area where the unit is located. Bridge Subsidy recipients are eligible to occupy a unit with 1 bedroom per household member.

c. If the rent exceeds the FMR, IDHS approval is required following the procedure in P4.06 Bridge Subsidy Units Over Fair Market Rent. Current FMR values can be found at https://www.huduser.gov/portal/datasets/fmr.html.

d. In many cases, having utilities included in the monthly rent will be beneficial to the participant. Many landlords may be willing to include the utilities in the rent upon request, even if they do not typically do so.

e. Additional resources for conducting an effective housing search are available through HUD at https://www.hudexchange.info/resources/housingsearchtool/.

f. Participants must have the opportunity to view multiple housing units but are not required to view multiple units before applying. Participants must be given the opportunity to decline a minimum of three (3) housing units in their area of preference before halting the housing search. Documentation should reflect that each unit viewed and offered as an option to the Class Member or FDDP Participant met their physical and functional needs (if any) and were also in their identified area of preference.

g. The minimum three (3) unit offer requirements does not include units that the Class Member was not approved for. If a Class Member's or FDDP Participant's application is denied or if the owner is unwilling to make necessary accommodations to the unit, these units cannot be included in the minimum three units offered to Class Members or FDDP Participant.

h. Landlords can be provided with basic information about the Bridge Subsidy program using optional form 4.6 Bridge Subsidy Information for Landlords. The Care Manager or housing locator should fill in the appropriate contact information for the Bridge Subsidy Administrator and Care Manager before use. The participant must also sign a release of information authorizing the provider to share the document with the prospective landlord.

i. Landlords can be provided additional general information about the Bridge Subsidy process via 4.15 Bridge Subsidy Instructions for Property Managers and Owners, 4.16 Bridge Subsidy Deeper Dive, and 4.17 IL Bridge Subsidy Flyer.

8. Once the participant has identified and been approved for a housing unit, the Care Management Agency should complete form 4.7 Bridge Subsidy Inspection Request and submit it to the Bridge Subsidy

Administrator. Agencies with HQS-certified staff may elect to engage in pre-inspections to expedite the process by following the procedure in P4.09 Bridge Subsidy Pre-Inspections by Prime Agencies.

a. The participant cannot sign a lease or move into the unit until it has passed the Housing Quality Standards (HQS) inspection and the Subsidy Administrator has made a determination about rent reasonableness, ensured that any necessary waivers are approved, and makes a rent offer to the landlord.
b. The Bridge Subsidy Administrator will return the inspection request form along with the results of the inspection once it is completed.
c. The unit being inspected must also comply with P4.04 Class Member Concentration and Waivers, including a request for a concentration waiver when required.

9. The Care Management Agency must work with the landlord to ensure they return the signed Housing Assistance Payment (HAP) contract to the Bridge Subsidy Administrator, along with a completed W-9 form and a signed copy of the lease.

10. The Care Management Agency should review documents 4.8 Bridge Subsidy Tenant Tips and 4.8a Bridge Subsidy Participant Handbook with the participant and provide them with copies of both. Review of these documents should be ongoing throughout the housing search process.

11. The Care Management Agency must help the participant obtain proof of income following their transition to the community, such as an updated Social Security award letter, and submit this to the Bridge Subsidy Administrator as soon as possible so that the final tenant rent portion can be calculated.

POST-TRANSITION/POST-DIVERSION UPDATE PROCEDURES

1. For Class Members, the Prime Agency is responsible for notifying IDHS of any significant changes in the Class Member's status during the first eighteen (18) months following transition as identified in P5.01 Documenting Post-Transition Engagement and Status Changes.

2. The Bridge Subsidy participant must cooperate with the annual recertification process. The Bridge Subsidy Administrator will send participants instructions regarding this process two-three (2 –3) months prior to the end of the lease. The Care Management Agency must assist the participant in completing this process, including facilitating communication with the Bridge Subsidy Administrator when necessary.

3. If the Bridge Subsidy participant decides to relocate at any point, they, or their Care Management Agency, must contact the IDHS Housing Coordination Team: DHS.CWCDHousing@Illinois.gov so that an appropriate transition plan can be developed prior to relocation.

4. For Colbert and Williams Class Members, reportable incidents must be reported during the first eighteen (18) months following transition, according to P5.02 Reportable Incidents.

5. Any changes to the composition of the participant's household, such as family members moving in or out, must be pre-approved by the Bridge Subsidy Administrator. The participant, or their Care Management Agency, must contact the Bridge Subsidy Administrator to make the request in writing.

6. If the participant's income decreases, they, or their Care Management Agency, must request a rent adjustment by contacting the Bridge Subsidy Administrator. Increases in income of 75% or more must

be reported to the Bridge Subsidy Administrator within thirty (30) days. Increases in income of less than 75% should be reported during the annual recertification process.

7. If the participant decides to withdraw from the Bridge Subsidy or otherwise exit at any point, they, or their Care Management Agency, must report the exit/withdrawal to the IDHS Housing Coordination Team DHS.CWCDHousing@Illinois.gov within one (1) business day and follow the process outlined in P4.07 Bridge Subsidy Opt Out. Only IDHS can terminate a Bridge Subsidy. Care Management Agencies cannot terminate a Bridge Subsidy for any reason, including a participant's non-compliance with recommended services. A case consultation can be requested via the WebApp to discuss cases that the Prime Agency believes warrants closure.

SUBMISSION REQUIREMENTS

- Submit applicable documents to the appropriate Bridge Subsidy Administrator immediately upon acceptance of a housing application.
- See P0.01 Document Submission Policy for contact and encryption information.

RELATED CLINICAL DOCUMENTS

- 4.2 Bridge Subsidy Overview
- 4.3 Bridge Subsidy Administrator Referral Form
- 4.4 Bridge Subsidy Participation Agreement
- 4.5 Referral for Transition Coordination
- 4.6 Bridge Subsidy Information for Landlords
- 4.7 Bridge Subsidy Inspection Request
- 4.8 Bridge Subsidy Tenant Tips
- 4.8a Bridge Subsidy Participant Handbook
- 4.9 Bridge Subsidy Opt Out
- 4.11 Certification of Zero Income
- 4.15 Bridge Subsidy Instructions for Property Managers and Owners
- 4.16 Bridge Subsidy Deeper Dive
- 4.17 IL Bridge Subsidy Flyer

Current versions of policies and clinical documents are available in the WebApp Library or at https://colbert-williams.nursing.uic.edu/.

RELATED FORMS

- 4.10 Bridge Subsidy Waiver Request

RELATED POLICIES

- P4.02 PAIR Module, SRN & Section-811 Waitlists
- P4.04 Class Member Concentration and Waivers
- P4.06 Bridge Subsidy Units Over Fair Market Rent
- P4.08 Bridge Subsidy for Participants with No Income
- P4.07 Bridge Subsidy Opt Out
- P5.01 Documenting Post-Transition Engagement and Status Changes
- P5.02 Reportable Incidents

REVISION & APPROVAL HISTORY

Revision Number	Revision Date	Nature of Revision	Approved By
1	4/8/2020	New procedure	
2	5/12/2021	Added detail to policy and procedures including material from Bridge Subsidy Overview document	A. Johnson
3	7/14/23	Reviewed and updated for FY24 procedures Definitions removed from policy and added to CCMTP Policy Definitions document	V. King
4	7/19/2024	Updates to align with current practice	T. Fuller
5	10/14/2024	Reviewed to reflect FY 25 procedures	V. King
6	1/2/2025	Changes to bridge subsidy eligibility	M. Miller Attang
7	4/24/2025	Added clarifying language to the forty-five-day SRN waitlist rule	M. Miller-Attang
8	5/12/2025	Removal of forty-five-day language pertaining to annual recertification process	M. Miller-Attang
9	8/22/2025	Clarification of procedure #7, item b Updated office name and contact information	M. Miller-Attang
10	4/1/2026	Change of forty-five-day rule to recommendation to reflect SRN changes. Added language regarding live-in aides	D. Hayes
11	10/1/2026	Removed reference to 45 day wait for SRN/811 application. Updated processes specific to Cluster housing residents.. Added 4.10 reference under Related Forms.	M. McCarthy