Colbert and Williams Consent Decree Programs
Policies and Procedures:
Bridge Subsidy for Participants with No Income

Policy Number:	P4.08
Subject:	Bridge Subsidy for Participants with No Income
Section:	P4 Housing Search
Scope:	Comprehensive Program, Front Door Diversion Program
Effective Date:	6/1/2021
Last Revision:	10/1/2026

POLICY STATEMENT

Colbert and Williams Class Members and Front Door Diversion Program (FDDP) Participants who are in the process of applying for income or seeking employment can use the Bridge Subsidy to secure permanent supportive housing. Class Members and FDDP Participants do not have to actively be receiving income to utilize the Bridge Subsidy. Class Members and FDDP Participants must report their income accurately to the Bridge Subsidy Administrator, including when they begin receiving income.

Note that this policy does not apply to individuals who are only receiving a personal needs allowance ($30 or $60) from Social Security while in the nursing facility or Specialized Mental Health Rehabilitation Facility (SMHRF). These individuals will most likely receive the full amount of their SSI or SSDI benefit once they are discharged to the community and are not considered to have low or no income.

Once a Bridge Subsidy recipient has reported no income for nine (9) consecutive months, the assigned Care Management Agency must review the individual's progress towards obtaining income. IDHS reserves the right to terminate the Bridge Subsidy after twelve (12) months if recipients are not actively seeking to secure income or fail to obtain a permanent housing subsidy when one is available.

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.

PROCEDURES

1. Once a potential Bridge Subsidy recipient is identified as having low or no income, the Care Management Agency must explore all available options for income available to the individual, as outlined in P6.03 Serving Members with No Income. These options may include the following, or combinations of the following:
    a. Full or part time employment.
    b. Family support.
    c. Veterans' benefits.
    d. Retirement benefits, including any private retirement plan(s) or pension(s).
    e. Social Security benefits, including Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), and Social Security Retirement Income (SSRI).

2. 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.

a. The Bridge Subsidy Participant and Care Management Agency are required to develop, agree upon, and sign a plan/agreement to manage needs in the community without income prior to the transition to the community.
b. Participants should consider all their monthly expenses and how they will pay for them in the community.
c. The Care Management Agency must assist the participant with linkage to services and supports that can assist them with paying for food, utilities, and other necessities. These include:
    i. Supplemental Nutrition Assistance Program (SNAP)
    ii. Low-Income Home Energy Assistance Program (LIHEAP)
    iii. Lifeline (government-funded cell phone)
    iv. Food pantries
    v. Any other benefit or service the participant may be eligible for.
d. The Care Management Agency should encourage the participant to look for housing options that include utilities in the rent amount or negotiate with the landlord to include utilities in the rent amount, to minimize the participant's monthly expenses.
e. For Class Members, the Prime Agency may use transition funds or flex funds to support the Class Member's needs while their income is pending, provided all other avenues of support have been exhausted. Class Member should be aware that this funding is only available for up to 18 months after transition.
f. Prime Agency should also refer to P6.03 Serving Members with No Income for additional information related to Class Members.
g. FDDP Providers should refer to P7.08a Serving FDDP Participants with No Income.

3. The participant must meet all other Bridge Subsidy eligibility and participation requirements.

4. The participant's tenant rent portion will be $0 upon their discharge to the community, with the Bridge Subsidy Administrator paying the full amount of the tenant's rent.

5. If the participant still has not obtained income after nine (9) consecutive months of receiving the Bridge Subsidy, the assigned Care Management Agency must review and document the individual's progress towards obtaining income and applying for permanent housing subsidies. If the Care Management Agency has concerns that the participant is not actively engaged in the process of securing income or fails to apply for and/or accept a permanent housing subsidy when an opportunity to do so becomes available:
    a. Prime Agencies must request a case consultation in the Web App and select the type as "Case Consultation - Post transition housing retention concerns." Refer to P3.04 Case Review for additional information. IDHS may invite CSH as deemed applicable for the consultation.
    b. Care Management Agencies serving participants for whom a case consultation cannot be requested in the Web App must request a case consultation call with the Housing Coordination Unit by email to DHS.CWCDHousing@Illinois.gov.
    c. The case consultation will determine whether and/or under what conditions the participant will continue to remain eligible for the Bridge Subsidy.
    d. IDHS reserves the right to terminate the Bridge Subsidy after twelve (12) months if recipients are not actively seeking to secure income or fail to apply for and/or accept a permanent housing subsidy when an opportunity to do so becomes available. Prime Agencies should make sure that Class Members are aware of this prior to transition.

6. The Bridge Subsidy Administrator will require information related to income and/or efforts to obtain income during annual recertification via the form 4.4a Bridge Subsidy Renewal Participation Agreement. Failure to work towards obtaining an income will be reported to IDHS for the duration of the Bridge Subsidy.

7. Once the participant obtains income, they are required to report this to the Bridge Subsidy Administrator within thirty (30) days. The Care Management Agency should ensure that the participant makes this report when it is required. The Bridge Subsidy Administrator will recalculate the tenant portion of the rent and notify the participant of the new amount.

RELATED FORMS

- 4.4 Bridge Subsidy Participation Agreement
- 4.4a Bridge Subsidy Renewal Participation Agreement
- 4.11 Certification of Zero Income

RELATED POLICIES

- P0.03 Prime Agency Assignments & Transfers
- P0.05 Transition Assistance Funds & Transition Flexible Funds
- P3.04 Case Review
- P6.03 Serving Members with No Income
- P7.08a Serving FDDP Participants with No Income

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

REVISION & APPROVAL HISTORY

Revision Number	Revision Date	Nature of Revision	Approved By
1	5/10/2021	New Procedure	A. Johnson
2	5/18/2021	Revised to include annual review	L. Jones
3	7/14/2023	Reviewed and updated for FY24 procedures. Definitions removed from policy and added to CCMTP policy Definitions document	V. King
4	3/15/2024	Revisions to include recommendations from the no-income workgroup	T. Fuller
5	10/14/2024	Reviewed and updated for FY25 procedures	V. King
6	8/22/2025	Updated email contact and removed 'DMH' in reference to IDHS. Removal of subsistence allowance language.	M. Miller-Attang
7	10/1/2026	Added reference to forms 4.4 and 4.4a	M. McCarthy