Colbert and Williams Consent Decree Programs
Policies and Procedures:
Bridge Subsidy Employment Incentive Program

Policy Number:	P4.11
Subject:	Bridge Subsidy Employment Incentive Program
Section:	P4 Housing
Scope:	Comprehensive Program, Front Door Diversion Program
Effective Date:	11/1/2022
Last Revision:	10/1/2026

POLICY STATEMENT

The Illinois Department of Human Services (IDHS) recognizes that Williams and Colbert Class Members and Front Door Diversion Program (FDDP) Participants who receive the Bridge Subsidy may lose their eligibility for the subsidy if their income from employment exceeds the Bridge Subsidy income threshold. This may create a disincentive to pursue employment opportunities.

The Employment Incentive Program allows Bridge Subsidy recipients to continue receiving the Bridge Subsidy, on a sliding scale, for up to eleven (11) months while they adjust to employment. This program requires regular communication between the Bridge Subsidy recipient, their care manager (if applicable), the Bridge Subsidy Administrator, and the IDHS Housing Coordinator.

The Social Security Administration (SSA) requires beneficiaries receiving Social Security Income (SSI) or Social Security Disability Income (SSDI) to report all income from any source to SSA. Failure to report income to SSA may result in the beneficiary becoming ineligible for benefits or owing money to the federal government. SSA has several employment incentive programs that are separate from this Bridge Subsidy incentive program; more information on these programs is available at https://www.ssa.gov/work/.

An increase in income may impact an individual's Medicaid eligibility or spenddown. Medicaid enrollment is a requirement for Bridge Subsidy participants; however, for individuals participating in the EIP program, a grace period of up to 11 months is allowed.

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. When a Bridge Subsidy recipient obtains employment or experiences any change in income, they should notify their care manager (if applicable), as well as the Subsidy Administrator.
2. The Subsidy Administrator will recalculate the recipient's total income and adjust their tenant portion of rent. If the recipient's income exceeds 30% of the Area Median Income, the recipient will be over the income limit and will need to be approved by IDHS for the Employment Incentive Program.
3. The Care Manager or Care Management Agency will submit a 4.12 Bridge Subsidy Employment Incentive Program form to the Subsidy Administrator and to the Housing Coordination unit at DHS.CWCDHousing@Illinois.gov
4. The Subsidy Administrator will immediately inform the IDHS Housing Coordination Unit of the income overage via email at, DHS.CWCDHousing@Illinois.gov, and request approval for the EmploymentIncentive Program.

5. If the IDHS Housing Coordination Unit approves the recipient's enrollment in the Employment Incentive Program, the Bridge Subsidy recipient will continue to receive the subsidy as follows:
    a. For the first six (6) months, the recipient will continue to pay up to 30% of their total income towards rent, including income from employment and their SSI/SSDI benefits.
    b. During months seven (7), eight (8), and nine (9), the recipient will pay up to 50% of their total income towards rent, including income from employment and their SSI/SSDI benefits.
    c. During months ten (10) and eleven (11), the recipient will pay up to 70% of their total income towards rent, including income earned from employment and their SSI/SSDI benefits.
    d. At month twelve (12), the Bridge Subsidy will be discontinued if there is no change in income status. The Subsidy Administrator will submit a HAP termination letter to the tenant and landlord during month eleven (11) to notify them of this change.
    e. If at any point during the Employment Incentive Program period, the recipient's income increases to the point that the total rent amount is less than 30% of the total income, the Bridge Subsidy will be terminated.
    f. At no time will the tenant's rent responsibility exceed the total rent amount.
6. If the Bridge Subsidy recipient loses employment for any reason, they are eligible to have their Bridge Subsidy reinstated. They will need to submit documentation to the Subsidy Administrator to confirm their lack of employment. Once documentation is provided, the subsidy will be reinstated, and the recipient will be responsible for paying 30% of their SSI/SSDI benefits in rent.
7. If the increased tenant rent portion will cause a financial hardship, the recipient may be eligible for an extension following the procedure under "Financial Hardship" below.

FINANCIAL HARDSHIP

IDHS does not want to discourage Bridge Subsidy recipients from working and wants to ensure that the Employment Incentive Program does not create financial hardship, particularly in situations where the Class Member's total income is only marginally over the limit. Particularly during months ten (10) and (11), when the tenant responsibility increases to 70% of total income, this may cause a financial hardship when considering utilities and other essential expenses.

1. In these cases, the Bridge Subsidy recipient or their representative may request a 90-day extension at a lower income percentage.
2. The Bridge Subsidy recipient or their representative should contact the Subsidy Administrator to request this extension; the Subsidy Administrator will consult with the IDHS Housing Coordinator to determine if this should be approved.
3. IDHS will verify participant's Medicaid enrollment and determine if the participant has been without Medicaid for more than 11 months.
4. Multiple 90-day extensions may be requested and granted.

REVISION & APPROVAL HISTORY

Revision Number	Revision Date	Nature of Revision	Approved By
1	12/7/2022	New procedure	R. Rollinson
2	7/14/2023	Reviewed and updated for FY24 procedures. Definitions removed from policy and added to CCMTP Policy Definitions document	V. King
3	7/26/2024	Reviewed to incorporate FDDP	T. Fuller
4	8/22/2025	Updated email contact and removed 'DMH' in reference to IDHS	M. Miller-Attang
5	10/1/2026	Added language regarding Medicaid eligibility.	D. Hayes