

RIHousing CoC Rental Assistance Program

Reimbursing for Supportive Services – Policies and Procedures

Supportive Services Costs

Supportive services are the costs of eligible supportive services that address the special needs of program participants. The CoC Program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible.

Recipients and subrecipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

Recipients may use CoC funds to pay for a wide range of supportive services that address the special needs of program participants. All CoC-funded supportive services must be essential to helping program participants obtain and maintain housing (24 CFR part 578.53(a)(1)). The CoC Interim Rule specifies fifteen (15) eligible supportive service costs (24 CFR part 578.53(d)).

For personnel funded under supportive services, the sub-recipient must maintain for each of those employees:

- Timesheets that reflect total hours spent on the grant by date **AND** company payroll records confirming a check was cut for employee showing how much employee was paid. The period covered by the timesheets and the company payroll record sheets must align. Both the timesheets and payroll records should be submitted monthly as part of the drawdown request.
- Activity records indicating client contact with date and time of appointments noted and other related and eligible case management duties. The activity records should be consistent with time sheet showing that there was case management activity on dates that are charged to case management. Activity records are not to be submitted for billing purposes but must be retained on site for review by RIHousing during monitoring.
- Case management staff must document all significant encounters with clients (case notes). Case notes must include dates, times, and type of encounter (telephone vs. in-person).

For transportation-based supportive services reimbursements, the sub-recipient must submit with the monthly drawdown request complete and signed transportation logs. These will be for the purpose of reimbursing for mileage (gas). Time and effort documentation should reflect the transportation logs.

To reimburse for vehicle repairs, documentation must be included with the monthly drawdown request that:

- Costs did not exceed 10 percent of the Blue Book value of the vehicle

- Costs were paid by the recipient/ subrecipient directly to the third party that repairs or maintains the car
- If recipient or its subrecipients required program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance, the records must document the program participant’s contribution

Documenting activity and case notes

The activity record should align with the case notes meaning the activity record will note a date and meeting with a program participant then the case note should also reflect that date and meeting. Activity records can be calendars if they reflect actual meetings, calls and work, an activity log, or other recording mechanism. Activity records need to match the information on timesheets and billing sheets. HUD does not have a format for case notes. Case notes can be entered into HMIS, an agency’s own proprietary system, or a paper file.

The following are SAMPLE Activity Records for a Case Manager. The first is a calendar and the second a distinct activity record/chart. **Only one is needed.**

Sample Activity Calendar

9 am	Client file review (15 minutes). Meeting with #PP0625 and case notes (45 minutes)
10 am	Meeting with #pp0475 and case notes (1 hour)
11 am	Called MRC for information on employment programs (30 minutes) Crisis with #pp0224 (
12 pm	Crisis with #pp0224 (Total 90 minutes)
1 pm	Lunch (30 minutes) Prepped for group meeting (30 minutes)
2 pm	Responded to inquiries about the program (30 minutes) Prep for group meeting (30 minute)
3pm	Group meeting (60 minutes)
4pm	Scheduled meeting with #pp00892 (no show) 45 minutes. 15 minute final case notes for day

Sample Activity Record

Date:		Case Manager: Jane Smith	
Time	Activity	Program Participant	Notes
15	Reviewed client notes/files to prep	All clients	
60	Client meeting and case notes	#pp0475	
30	Call with MRC	All	Research employment programs
90	Crisis with #pp0224	#pp0224	Intervention needed
30	Lunch		
30	Prep for group meeting	All	Prep time
30	Responded to shelter’s questions on program	All	
30	Continued prep for group meeting	All	
60	Group meeting	All	Topics: employment barriers
45	No show on scheduled meeting	#pp00892	Called, sent text,
15	Final notes for day	All	

Below is a guide of eligible supportive services. If you contract with another agency to provide services, the invoice for those services should show the time and effort by the agency for the provision of the services. Services provided and the time spent are detailed during the application process.

Timesheets should document the amount of time spent on supportive services for each grant, not each service. Effort documentation (activity records and case notes) will identify the services provided during the time recorded. These are all the supportive services that are eligible at the current time. All drawdowns must include time sheets with time spent on the grant identified, as well as supporting documentation for transportation or vehicle repair reimbursement request.

Activity records and case notes must relate to one of these specific eligible costs. Annual monitoring of supportive service reimbursements will include analysis of the details provided in the effort documentation proving that supportive services were eligible. Effort documentation lacking detail or detailing activity not eligible per the CoC Interim Rule will result in compliance findings.

Service	Description
a. Annual Assessment of Service Needs	The costs of providing annual assessments of the service needs of program participants are eligible
b. One-time moving costs [24 CFR 578.53(e)(2); 24 CFR 578.103(a)(9)]	Truck rental and hiring a moving company are eligible costs. Moving costs are only allowable under supportive services
c. Case management [24 CFR 578.53(e)(3); 24 CFR 578.103(a)(9)]	(i) Counseling; (ii) Developing, securing, and coordinating services; (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9). (iv) Obtaining federal, State, and local benefits; (v) Monitoring and evaluating program participant progress; (vi) Providing information and referrals to other providers; (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.
d. Child care [24 CFR 578.53(e)(4); 24 CFR 578.103(a)(9)]	The costs of establishing and operating child care, and providing child-care vouchers, for children experiencing homelessness are eligible. Children must be under the age of 13 unless they are disabled. Disabled children must be under the age of 18.
e. Education services [24 CFR 578.53(e)(5); 24 CFR 578.103(a)(9)]	The costs of improving knowledge and basic educational skills are eligible. These may include instruction or training in consumer education, health education, substance abuse prevention, literacy, ESL & GED classes.

<p>f. Employment assistance and job training</p> <p>[24 CFR 578.53(e)(6); 24 CFR 578.103(a)(9)]</p>	<p>The costs of establishing and operating employment assistance and job training programs are eligible. These may include classroom, online and/or computer instruction, on-the-job instruction, and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.</p>
<p>g. Food</p> <p>[24 CFR 578.53(e)(7); 24 CFR 578.103(a)(9)]</p>	<p>The cost of providing meals or groceries to program participants is eligible. ONLY eligible if food has been included in the budget detail submitted with the application or an amendment.</p>
<p>h. Housing search and counseling services</p> <p>[24 CFR 578.53(e)(8); 24 CFR 578.103(a)(9)]</p>	<p>The costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. Component services and activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements. Other eligible costs include the following: Mediation with property owners and landlords on behalf of eligible program participants; Funds may not be used to pay for eviction costs. Credit counseling, accessing a free credit report, and resolving personal credit issues; and the payment of rental application fees. Background checks are considered an eligible cost if included as part of a rental application fee or as a program eligibility requirement.</p>
<p>i. Legal services</p> <p>[24 CFR 578.53(e)(9); 24 CFR 578.103(a)(9)]</p>	<p>Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless household's ability to obtain and retain housing. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants. Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.</p>
<p>j. Life skills training</p> <p>[24 CFR 578.53(e)(10); 24 CFR 578.103(a)(9)]</p>	<p>The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.</p>

<p>k. Mental health services provided by licensed professionals</p> <p>[24 CFR 578.53(e)(11); 24 CFR 578.103(a)(9)]</p>	<p>Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.</p>
<p>l. Outpatient health services provided by licensed medical professionals</p> <p>[24 CFR 578.53(e)(12); 24 CFR 578.103(a)(9)]</p>	<p>Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including: Providing an analysis or assessment of an individual's health problems and the development of a treatment plan; Assisting individuals to understand their health needs; Providing directly or assisting individuals to obtain and utilize appropriate medical treatment; Preventive medical care and health maintenance services, including in-home health services and emergency medical services; Provision of appropriate medication; Providing follow-up services; and Preventive and non-cosmetic dental care.</p>
<p>m. Outreach services</p> <p>[24 CFR 578.53(e)(13); 24 CFR 578.103(a)(9)]</p>	<p>The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible. Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach. Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.</p>
<p>n. Substance abuse treatment</p> <p>NOTE: Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.</p> <p>[24 CFR 578.53(e)(14); 24 CFR 578.103(a)(9)]</p>	<p>The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible. Training costs are unallowable. Any costs that are not included in the budget detail submitted with the application are ineligible.</p>
<p>o. Transportation:</p>	<p>Costs of program participants' travel on public transportation or in a vehicle provided by the recipient/subrecipient(s) to/from medical care, employment, child care, or other eligible supportive services</p> <p>[24 CFR 578.53(e)(15)(i); 24 CFR 578.103(a)(9)]</p>
	<p>Costs of mileage allowance for service workers to visit program participants</p>

	[24 CFR 578.53(e)(15)(ii); 24 CFR 578.103(a)(9)]
	Costs of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants [24 CFR 578.53(e)(15)(iii); 24 CFR 578.103(a)(9)]
	Costs of gas, insurance, taxes, and maintenance for a vehicle transporting staff serving program participants [24 CFR 578.53(e)(15)(iv); 24 CFR 578.103(a)(9)]
	Costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation [24 CFR 578.53(e)(15)(v); 24 CFR 578.103(a)(9)]
p. Participant's vehicle repairs:	A one-time payment for car repairs or maintenance where public transportation did not exist or was insufficient [24 CFR 578.53(e)(15)(vi); 24 CFR 578.103(a)(9)]
q. Utility deposits: [24 CFR 578.53(e)(16); 24 CFR 578.103(a)(9)]	A one-time fee paid directly to the utility companies