

### **Projects for Assistance in Transition from Homelessness (PATH) Grant**

**Requirement:** Contract  
42 U.S.C. 290cc-22 et. seq.  
42 C.F.R., Part 54

**Frequency:** Annual Monitoring  
Annual Report  
Quarterly Report

**Due Date:** Ongoing

#### **Discussion:**

The purpose of this document is to provide guidance to Managing Entities and Network Service Providers for the implementation and administration of the Projects for Assistance in Transition from Homelessness (PATH) Grant. The PATH grant funding varies annually and is a non-competitive, formula grant distributed to all states and U.S. territories by from the Substance Abuse and Mental Health Services Administration (SAMHSA). PATH grant funds are the only funds dedicated specifically for individuals with mental health or co-occurring substance use disorders who are experiencing homelessness or at risk of homelessness. PATH programs are required to provide matching funds of no less than \$1 match funds for every \$3 federal funds received. PATH grant funds are distributed to the Managing Entities which in turn allocate funds to contracted community providers.

#### **I. Goal**

The goal of the PATH grant is to reduce or eliminate homelessness for individuals with serious mental illnesses and co-occurring substance use disorders who are experiencing homelessness or at imminent risk of becoming homeless. Grant funds are used for outreach to adults with serious mental illness or co-occurring mental health and substance use disorders who are homeless or at imminent risk of becoming homeless, and connect them to behavioral health services, housing supports, and services that are not traditionally funded by behavioral health programs

#### **II. Eligibility**

PATH eligible consumers must be:

- 18 years or older,
- Have serious mental illnesses or serious mental illnesses and co-occurring substance use issue, and
- Experiencing or at imminent risk of becoming homeless.

#### **III. Network Service Provider Responsibilities**

The Managing Entity shall contract with Network Service Providers who qualify under 42 U.S. Code § 290cc-22 and have the capacity to provide, directly or through arrangements, allowable services, including coordinating the provision of services to meet the needs of eligible individuals. The Managing Entity shall conduct quarterly monitoring activities to ensure compliance with PATH Grant regulations and the standards set forth herein.

To be considered for PATH Grant funding a provider must ensure the following:

1. Program Requirements

a. PATH- funded case managers must:

- i. Provide individualized support by helping each PATH-enrolled individual develop a personalized service plan to address any barriers to obtaining and maintaining permanent housing.
- ii. Provide employment linkage, benefits establishment, linkage to community providers for substance use treatment, primary medical and mental health care, and all other services needed to assist individuals in reaching their recovery goals.
- iii. Perform community outreach to business owners, realtors, landlords, housing developers and other service providers to build strong relationships and identify new and existing opportunities to better assist individuals in accessing resources, employment, supportive services, and housing opportunities.
- iv. Review service plans every three months, and the plan must include:
  - Community mental health services;
  - Coordination and referrals for needed services such as shelter, daily living activities, personal and benefits planning, transportation, habilitation and rehabilitation services, prevocational and employment services, and permanent housing; and
  - Assistance obtaining income and income support services, Supplemental Nutrition Assistance Program (SNAP) benefits, and Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI).

- b. Maintain individual case records for each PATH participant containing an intake form, a determination of eligibility for PATH-funded services, a service plan, and progress notes.
- c. Submit the PATH Annual Report no later than November 1<sup>st</sup> via the PDX system located here: <https://pathpdx.samhsa.gov/>
- d. Train designated staff on SSI/SSDI Outreach, Access, and Recovery (SOAR) using the SOAR Online Course, available at: <https://soarworks.samhsa.gov/>. In the event PATH staff do not provide SOAR services, PATH staff must link potentially eligible individuals to non-profit or advocacy organizations assisting with applications for Social Security benefits.
- e. Enter SSI/SSDI application data into the SOAR Online Application Tracking (OAT) database at <https://soartrack.samhsa.gov/>, in accordance with Managing Entity Contract Guidance 9.
- f. Provide at least one dollar of local match contribution for every three dollars of PATH funds received and expend local matching funds to provide eligible services to PATH participants. Match-funded expenditures must align with the services identified in the local IUP budget.

- g. Calculating Match contributions:
  - i. Example: \$300,000 federal award
    - Calculation:  $\$300,000/3 = \$100,000$  minimum match to be provided
    - TOTAL PATH EXPENDITURES = \$400,000
- h. Employ policies and procedures that ensure priority use of other available funding sources for services (i.e., Medicaid).
- i. Include consideration of continuity of care needs specifically for people experiencing homelessness in disaster response plans. PATH Providers shall assess, at least annually, and amend as appropriate, their disaster response plan to ensure it continues to meet the service needs of the target population.
- j. Participate and collect consumer data in the Homeless Management Information System (HMIS) and establish plans for new hire training and continued training.

Adhere to data quality target measures as established by the Managing Entity.
- k. Adhere to the standards established in the Florida PATH Program Manual.
- l. Follow F.A.C. 65E-14.021(4)(k)4.b.(V) when billing incidental expenses.

2. The Department reserves the right to exclude any entity seeking to apply for PATH Grant funding.

### 3. Required Activities

- a. The Network Service Provider shall:
  - i. Submit a Local Intended Use Plan (IUP) to the Managing Entity by September 18th of each year in order the Managing Entity to review for accuracy, approve, and submit a draft of the Local Intended Use Plan (IUP) to the State PATH Contact (SPC) by October 1st of each year. The IUP must clearly and completely respond to each question in the most recent PATH Grant Notice of Funding Opportunity published by the Substance Abuse and Mental Health Services Administration available here: [Grants | SAMHSA](#). The IUP must meet the formatting requirements outlined in the Notice of Funding Opportunity and be free from grammatic and mechanical errors, missing information, numbers, service description, etc. If the IUP must be returned to the Managing Entities or provider more than three times for revisions, the provider will not be considered for the upcoming PATH Grant award.
  - ii. Network Service Providers must submit a local IUP budget and a separate budget narrative, including all sources of match contributions on or before the due date specified by the SPC. If the Budget must be returned to the Managing Entity or provider more than three times for corrections, the provider will not be considered for the upcoming PATH Grant award.
  - iii. During a PATH Grant mini-application year (biennial) or if no significant changes to PATH programs are anticipated for the upcoming Grant period, the Managing

Entity shall email the SPC by October 1st certifying that the response to the previous year's IUP has not changed. A local IUP budget, budget narrative, and updated data on Fiscal Year outcomes, demographics, and projected numbers and percentages must be submitted annually.

1. For budget submission requirements, please see section III.1.a.ii. above.
- b. PATH Providers are required to develop and implement a quality improvement plan for the use of program data on access, use, and outcomes to support efforts to decrease the differences in access to, use, and outcomes of service activities. Providers may incorporate the quality improvement (QI) plan as part of their larger QI plan provided that the PATH eligible population is considered. PATH Providers are encouraged to collect and use data to:
  - i. Identify the number of individuals to be served during the grant period,
  - ii. Identify subpopulations (i.e., racial, ethnic, sexual, and gender minority groups) vulnerable to behavioral health disparities to be actively addressing, and
  - iii. Identify methods for the development of policies and procedures to ensure adherence to the National Standards for Culturally and Linguistically Appropriate Services (CLAS) in Health and Health Care.
- c. PATH Providers shall collaborate with local stakeholders and access resources to link individuals with safe, affordable housing.

#### **IV. Best Practice Considerations: PATH Enrollment**

For consistency across programs, the Providers shall use the PATH Enrollment Checklist below and file the completed document in the medical record when enrolling participants.

#### **V. Eligible Services**

PATH-funded services may include screening, clinical assessment, community-based mental health services, substance use treatment, and housing assistance. Eligible services can be found in subsection 522(b), (42 U.S. Code § 290cc–22). (Services are not the same as referrals, so if the PATH program does not actually deliver a PATH-funded service to the individual it should be considered a referral). Additional terms related to the PATH Program workflow, referrals, and services may be found in the PATH Annual Report Manual.

**COVERED COSTS:** Allowable administrative and general program costs that are incurred under the Projects for Assistance in Transition from Homelessness (PATH) Grant.

**RECIPIENTS:** Individuals with serious mental illness or serious mental illness and substance use disorders, and are homeless or at imminent risk of becoming homeless.

Allowable PATH- funded services:

- a. Outreach services;
- b. Screening and diagnostic treatment services;
- c. Habilitation and rehabilitation services;

- d. Community mental health services;
- e. Alcohol or drug treatment services;
- f. Staff training, including the training of individuals who work in shelters, mental health clinics, substance abuse programs, and other sites where individuals who are experiencing homelessness and serious mental illness seek services;
- g. Case management services, including:
  - 1. Preparing a plan for the provision of community mental health and other supportive services to the eligible homeless individual involved, and reviewing such plan not less than once every 3 months;
  - 2. Providing assistance in obtaining and coordinating social and maintenance services for the eligible homeless individuals, including services relating to daily living activities, personal financial planning, transportation services, and habilitation and rehabilitation services, prevocational and vocational services, and housing services;
  - 3. Providing assistance to the eligible homeless individual in obtaining income support services, including housing assistance, food stamps, and supplemental security income benefits;
  - 4. Referring the eligible homeless individual for other services as needed; and
  - 5. Providing representative payee services in accordance with section 1631(a)(2) of the Social Security Act if the eligible homeless individual is receiving aid under title XVI of such act;
- h. Supportive and supervisory services in residential settings;
- i. Referrals for primary health services, job training, educational services, and relevant housing services;
- j. Housing services, upon approval of the Managing Entity including:
  - 1. Minor renovation, expansion, and repair of housing;
  - 2. Planning of housing;
  - 3. Technical assistance in applying for housing assistance;
  - 4. Improving the coordination of housing services;
  - 5. Security deposits;
  - 6. The costs associated with matching eligible homeless individuals with appropriate housing situations; and
- k. One-time rental payments to prevent eviction.

**FUNDING:** Costs associated with this BE/OCA combination are directly charged to the PATH Grant and requires one-third of the total fiscal year allocation, in-kind or cash match.

**CHARTING:**

**Admissions and Discharge**

All PATH admissions are voluntary and require consent and participation.

The Network Service Provider shall maintain the following clinical documentation for individuals served in the program:

**Intake Documentation Requirements**

The file contains basic demographic information, which includes; (1) Client's name, (2) address, (3) telephone number, (4) marital status, (5) sex, (6) legal status, (7) race, (8) date of birth, (9) guardian contact information for minors, (10) referral source and (11) staff name of who has responsibility of the client.

The file contains, if applicable, a time-specific statement authorizing release of confidential information, signed and dated by the client or guardian, which designates the agency to receive the information, purpose of the disclosure, how much and what kind of information to be disclosed, statement that the consent is subject to revocation at any time and date which consent will expire if not revoked before.

### **Assessments/Examination Documentation Requirements**

The PATH assessment is completed within 30 days after intake and includes the following with client input: (1) presenting problem, (2) current and potential strengths and problems, (3) relationship with family members and significant others, (4) service agencies with whom the client has been involved and involvement or need for involvement in social support systems.

### **Service/Treatment Planning**

The PATH service/treatment plan is completed 30 days after intake with the following goals and objectives with client input: (1) Achievable observable measurable, (2) reasonable timeframe, (3) actions needed to attain the goals and staff responsible, (4) incorporate needs and strengths from the assessment and (5) goals for each identified issue.

### **Progress Notes Requirements**

PATH Progress notes shall be prepared at least monthly for clients having a service/treatment plan unless documented otherwise.

Progress notes contain the (1) client's name, (2) client identification number, (3) staff name, (4) service date, (5) service duration, (6) a description of the service provided, (7) progress, or lack thereof, relative to the service/treatment plan or modified service/treatment plan from changes in client's needs, resources or findings.

PATH Progress note content address PATH case management and housing activities.

### **Discharge/Termination Requirements**

If no contact over 90 days, file must be closed, unless service/treatment plan indicates less frequent contact. The reason for the discharge/termination must be included.

Discharge/Termination report must be in the client record within 4 weeks after the termination of services.

Discharge/Termination report shall include the following: Evaluation of impact of agency's services on client's goals/objectives, date and signature of individual preparing report, if there is a referral and a reason for the referral must be noted.

### **Funding and Allocations:**

In order to appropriately serve persons in accordance with the provisions contained herein, **Case Management must be billed at minimum 30%** of the total service delivery billing per fiscal year, not including incidentals.

The provider will follow the staffing pattern as outlined in their approved PATH IUP.

### **Performance Measures:**

The provider will serve the minimum number of individuals as outlined in the approved PATH IUP.

#### **Government Performance and Results Act (GPRA) Measures**

The current performance requirements for PATH as specified under GPRA are as follows:

- 3.4.15 Percentage of enrolled homeless persons who receive community mental health services (Outcome);
- 3.4.16 Number of homeless persons contacted (Outcome);
- 3.4.17 Percentage of contacted homeless persons with serious mental illness who become enrolled in services (Outcome); and
- 3.4.20 Number of PATH providers trained on SSI/SSDI Outreach, Access, and Recovery (SOAR) to ensure eligible homeless clients are receiving benefits (Output).

National targets are set annually for each GPRA measure, and the PATH program's nationwide performance is measured in comparison to these targets. Individual provider programs whose PATH Annual Report data indicates that they are below 80% of the target are asked to provide an explanation for their data. SAMHSA Government Project Officers (GPOs) and/or State PATH Contacts may contact PATH providers regarding programs who consistently underperform on these measures. Technical assistance may be considered to assist the provider in improving their performance on certain measures.

Additional information about PATH GPRA measures can be found in the Congressional Justification (<http://www.samhsa.gov/budget>).

### **VI. Required Reports:**

#### **1) Monthly Reports**

- a. The Network Service Provider must submit the PATH Incidental Expenses Summary Report to the Network Manager and Housing Coordinator by the 8<sup>th</sup> of the month. **The Template for this report is incorporated herein.**

#### **2) Annual Reports**

- a. The Network Service Provider must submit an annual report into the PATH Data Exchange by November 1<sup>st</sup> via the PATH Data Exchange (PDX) at <https://www.pathpdx.org/>. More information and guidelines for annual report submission may be located at: <http://www.pathprogram.samhsa.gov>

#### **3) Quarterly Reports**

- a. The Network Service Provider must submit the PATH Quarterly Housed Report to the Network Manager and Housing Coordinator by the 8<sup>th</sup> day of the month following the end of each quarter. **The Template for this report is incorporated herein.**

- 4) Ad Hoc and additional reporting may be required as determined necessary by LSF Health Systems or the Department of Children and Families.

#### **PATH Providers**

<b>Network Service Provider</b>	<b>County</b>
City Rescue Mission	Duval/Clay/Nassau
Mid Florida Homeless Coalition	Citrus/Lake/Hernando/Sumter/Marion
Volusia/Flagler County Coalition for the Homeless, Inc.	Volusia/Flagler
Meridian Behavioral Healthcare	Bradford/Alachua/Gilchrist/Levy/Union/Baker
TaskForce Fore Ending Homelessness	Putnam

Projects for Assistance in Transition from Homelessness (PATH) Grant will be administered according to DCF Guidance 15 and the Florida PATH Program Manual. DCF Guidance 15 can be found at following link using the applicable fiscal year: <http://www.myflfamilies.com/service-programs/samh/managing-entities>

**Definitions** - For the purpose of the PATH Program Manual, the following definitions apply:

- a. **Co-occurring Serious Mental Illness and Substance Use Disorder.** An individual who has at least one serious mental health disorder and a substance use disorder, where the mental health disorder and substance use disorder can be diagnosed independently of each other.
- b. **Individual Experiencing Homelessness.** An individual experiencing homelessness must be as least restrictive as defined by the Public Health Service (PHS) Act: “an individual who lacks housing (without regard to whether the individual is a member of a family), including an individual whose primary residence during the night is a supervised public or private facility that provides temporary living accommodations, and an individual who is a resident in transitional housing.
- c. **Imminent Risk of Becoming Homeless.** The criteria commonly include one or more of the following: doubled-up living arrangements where the individual’s name is not on a lease, living in a condemned building without a place to move, having arrears in rent/utility payments, receiving an eviction notice without a place to move, living in temporary or transitional housing that carries time limits, and/or being discharged from a health care or criminal justice institution without a place to live.
- d. **Serious Mental Illness.** An individual 18 years of age or older with a diagnosable mental health disorder of such severity and duration as to result in functional impairment that substantially interferes with or limits major life activities.

#### **Helpful Resources**

Projects for Assistance in Transition from Homelessness program details including, the funding opportunity announcement can be found by following this link: <https://www.samhsa.gov/homelessness-programs-resources/grant-programs-services/path>.

#### **PDX**

PATH Annual Report data are collected in the PATH Data Exchange (PDX) during the PATH reporting period, which typically occurs in the fall each year. PATH providers are notified when the reporting period



is open and of the date of the federal deadline. The PDX has a “Resources” section where SPCs and PATH providers can access the PATH Annual Report Provider Guide and technical assistance resources. PDX link can be found here: [www.pathpdx.org](http://www.pathpdx.org).

### **SAMHSA**

The Substance Abuse and Mental Health Services Administration (SAMHSA) is the agency within the U.S. Department of Health and Human Services that leads public health efforts to advance the behavioral health of the nation. SAMHSA's mission is to reduce the impact of substance abuse and mental illness on America's communities. Link to SAMHSA's website here: <https://www.samhsa.gov/about-us>.

### **SAMHSA's Homelessness Resource Center (HRC)**

Targeted toward providers who work with people who are experiencing homelessness, the HRC website (<http://homeless.samhsa.gov>) shares state-of-the art knowledge, evidence-based practices, and practical resources. It provides an interactive learning opportunity for researchers, providers, individuals, and government agencies at all levels. It is an easy-to-manage resource with content that informs, features that engage, and training that is useful. These elements come together to promote recovery-oriented and individual-centered homeless services.

### **SOAR**

SSI/SSDI Outreach, Access, and Recovery (SOAR) is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA) and is a national program designed to increase access to the disability income benefit programs administered by the Social Security Administration (SSA) for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, and/or a co- occurring substance use disorder. SOAR resources and online training are available at this link: <https://soarworks.prainc.com/>.

### **U.S. Interagency Council on Homelessness**

The United States Interagency Council on Homelessness (USICH) is an independent agency within the federal executive branch that is tasked with coordinating the federal response to homelessness. A variety of resources can be accessed on the USICH website (<http://usich.gov/>) including Opening Doors, the federal plan to prevent and end homelessness, as well as articles, newsletters, videos, and webinars on topics related to preventing and ending homelessness.

### **WebBGAS**

WebBGAS is a web-enabled block grant management system that allows for the submission, review, approval, and archiving of PATH applications. The official WebBGAS website here: <https://bgas.samhsa.gov>

### PATH Enrollment Checklist

**Enrollment:** PATH enrollment implies that there is the intent to provide services for an individual other than those provided in the outreach setting. The term enrolled means that there is a mutual intent for the services to begin. PATH enrollment is when:

- 1) The individual has been determined to be PATH eligible,
- 2) The individual and the PATH Provider have reached a point of engagement where there is a mutual agreement that services will be provided, and
- 3) The PATH Provider has started an individual file or record for the individual that includes, at a minimum:
  - a. Basic demographic information needed for reporting,
  - b. Documentation by the Provider of the determination of PATH eligibility,
  - c. Documentation by the Provider of the mutual agreement for the provision of services,
  - d. Documentation of services provided, and
  - e. Service plan if the PATH enrollee is receiving case management services.

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\_\_\_\_\_ has been determined eligible for PATH

(Name of Person Served)

enrollment based on meeting the following criteria:

- ☐ He/she has a mental health diagnosis of \_\_\_\_\_ OR
- ☐ There is an informed presumption that the individual has a serious mental illness because:
- ☐ He/she is experiencing or displaying symptoms of mental illness and is experiencing difficulty in functioning as a result of these symptoms that indicates severity,
- ☐ He/she has shared or has a known history of engagement with mental health services,
- ☐ He/she has symptoms and functioning that indicates there is a history of or expected tenure of significant mental health concerns

**AND**

- ☐ He/she lacks any housing, OR
- ☐ His/her primary residence during the night is a supervised public or private facility that provides temporary living accommodations, OR
- ☐ He/she is a resident in temporary or transitional housing that carries time limits, OR
- ☐ He/she is in a doubled-up living arrangement where his/her name is not on the lease, OR
- ☐ He/she is living in a condemned building without a place to move, OR
- ☐ He/she is in arrears in rent/utility payments, OR
- ☐ He/she has received an eviction notice without a place to move, OR
- ☐ He/she is being discharged from a health care or criminal justice institution without a place to live, OR

☐ He/she is living in substandard conditions that could result in homelessness due to local code enforcement, police action, voluntary action by the person, or inducements by service providers to go to alternatives like short-term shelters whose residents are considered to be homeless.