

**MA-500 / Boston CoC Final Policy**  
**Withdrawing PSH Mobile Vouchers Due to Participant Disengagement**

**Rationale:** The Mobile PSH Voucher Policy is intended to give navigators, SSP's and HSA's structure to terminate a PSH voucher when there has been *no contact* from a participant. This policy covers the time periods between the HSA accepting a CAS match and scheduling a briefing, and the time period after the voucher has been issued. This policy does not apply to clients who have had contact with the below entities, even if the contact is sporadic in nature.

**30 Days to Complete a PSH Voucher Briefing and Meeting w/Supportive Service Provider (SSP):** When a participant is matched to a mobile permanent supportive housing (PSH) voucher through the Coordinated Access System (CAS), the participant, Housing Subsidy Administrator (HSA) and SSP have 30 days from the date the HSA accepts the CAS match to:

- 1.) Complete a voucher briefing AND
- 2.) Complete an initial meeting between the participant and the SSP

If the above has not happened within a 30 days due to the HSA/SSP/navigator receiving no participant contact to schedule the briefing, the HSA/SSP should move to cancel the CAS match.

*SSP Attendance at Housing Briefings:* To accomplish the above two goals in the most efficient way possible for all parties, HSA's agree to alert the assigned SSP of the time/date of the briefing so SSP staff can attend. SSP staff are expected to attend briefings to connect with the participant and minimize participant appointments to maintain the voucher. It is expected to be a rare circumstance that an SSP cannot send a staff person to the briefing to connect with the participant- in these circumstances, the SSP and participant must have an initial meeting within 30 days of the CAS match being made.

**Timeline of Actions- No Participant Contact (Total of 90 day period):** There is no specified time limit on housing search time for mobile PSH vouchers, as long as the participant has contact with the housing navigator and/or SSP. However, if the participant has not had contact with the SSP/navigator during any 90 day period after the voucher was issued, the voucher may be terminated. The following timeline should be used if an SSP and/or housing navigator has not had contact with the participant after the voucher briefing:

1. 60 days- Alert Chronic Working Group: After 60 days of no contact with the participant from the briefing date, the SSP or navigator should flag the case for the Chronic Working Group to figure out potential solutions to connecting with the participant. Please note that participants may be reviewed at Chronic Working Group prior to 60 days of no contact; 60 days is the maximum amount of time to wait before bringing the case to the group.
2. 30 additional days- No Contact, Voucher Termination: If an additional 30 days passes without any contact from the participant, the SSP should make a recommendation to terminate the voucher to the HSA, and the HSA should move forward with terminating the voucher.

### **Considerations Before Moving to Voucher Termination**

Shelter/Program Bars: A bar from a day or night shelter does not automatically terminate a participant's voucher. The HSA/Navigator/SSP staff should continue to serve participants barred from a day or night shelter and should defer to agency policy for appropriate means to do so (written acknowledgement from a supervisor, meetings with unhoused guests in a staffed setting, two staff members present during meetings).

Hard to Reach Participants: The SSP/HSA will not terminate a participant's voucher simply because the participant is difficult to reach. The SSP/HSA may move to terminate a voucher if the case manager or case management team has demonstrated they have done due diligence to contact and engage the participant. Staff effort to connect with the participant must be documented in the case file. Due diligence is defined as:

- Outreach attempts occur at a minimum of once a week, and must include the following:
  - Check Windows into the Warehouse to find updated participant shelter/outreach contacts
  - Contact available shelter case managers and leadership when applicable
  - Call/text participant using available phone numbers at varied times of day.
  - Email participant using available email addresses
  - Contact any collateral contacts participant allows
  - If able, contact community partner services for hospital stays
- The HSA/SSP should continue to note any client who disengages in CAS updates for stalled matches
- At the 60 day mark, the SSP should request that the client be raised at the Chronic Working Group to discuss how to re-engage

### **Voucher Termination Protocol**

To Terminate a CAS mobile voucher, agencies must use their internal termination processes, which at a minimum must include:

- Participant and case manager/navigator is informed of this policy by SSP/HSA in writing and signed an acknowledgement at the time of voucher issuance.
- Participant and case manager/navigator receives a letter from SSP warning the voucher is at risk of termination during SSP's outreach attempts. Client letter should be sent to last known address, preferably not shelter.
- Participant and case manager/navigator receives a formal notice of termination from SSP in writing, specifying the reason for termination, the process to appeal the termination, and how the participant may request a reasonable accommodation to overcome the termination.
- SSP submits the termination paperwork to the HSA for final approval.
- Agencies that function as both the SSP and the HSA can submit documentation internally and must ensure that the individual who decided to terminate the voucher is not the individual who facilitates the appeal hearing.
- SSPs must specify timelines of when to request an appeal, and when a decision will be made.

- Prior to a final decision, the HSA should notify the CAS Manager at DND that they are moving to terminate the voucher.
- The HSA must refrain from cancelling the CAS match until a final decision has been reached about the current participant. The HSA/SSP may always cancel appeal hearings if the client resumes contact and the agency deems an appeal hearing is no longer needed.
- If a final decision is made to terminate, the SSP must inform the participant that the termination does not preclude them from being re-referred to a new voucher slot.