



PSH Monthly FAQ: October 2018

1. Is jail time considered homeless for the chronically homeless definition or would just the release to street after jail be the homeless definition that qualifies?

- a. If the jail time is less than 90 days, it can be counted towards the time of chronically homeless.

2. Do we have to pay for client utilities? (Only applies to Rental PSH grants- PSH Dedicated Plus, State of Michigan Leasing Assistance)

- a. No. However, it is an allowable expense and a great service to clients that need it. There are several things to consider:
 - i. The number of clients you are serving and the rental budget you have.
 - ii. If multiple clients' assistance is above the FMR, you may run out of funds.
 - iii. Some clients may need the utility assistance more than others; some clients may be unable to pay utilities.

3. Can we pay utilities directly to the utility company? (Only applies to Rental PSH grants- PSH Dedicated Plus, State of Michigan Leasing Assistance)

- a. Yes, if the client gives you permission in writing. However, that does cause some complications.
 - i. If the utility allowance is less than the utility bill, the tenant is still responsible for the remaining balance. You will need to help the tenant manage this so they don't fall behind in bills.
 - ii. If the utility allowance is more than the utility bill, there are 3 options for the tenant's preference:
 - 1. The agency pays the bill and gives the balance to the tenant.
 - 2. The agency pays the bill and the agency hangs on to the balance to apply to the next bill- this will need to be tracked and would account for fluctuating utility costs depending on the season. This must be tracked in program records.

3. See if the utility company can take the whole payment and use the balance as a credit toward the next bill.

4. Can a single person live in a 2 bedroom unit?

- a. Typically, no. However, it is allowable if:
 - i. The person has medical need for 2 bedrooms and you have documentation stating such from a medical provider.
 - ii. The rent with utilities is equal to or less than the HUD FMR for a 1 bedroom unit in that county.

5. If the rent is higher than the FMR, can the tenant pay the difference?

- a. Yes. However, if you complete a rent reasonableness form that shows that other units of the same size and similar amenities in the same county are similar in cost, then you can pay for the higher rent (if approved by MDHHS and only for rental grants). Do be mindful of your overall rental line item budget so that you won't run out of funds before the grant term ends.

6. Our agency covers 2 counties, with 3 units in each. Do we have to stick to 3 units in each county or can we serve 4 in one and 2 in another? (applies only to Balance of State CoC partners)

- a. Yes. You have flexibility with your units. As long as you are serving clients in counties that fall within the BOS CoC, that is fine. If one of your counties has a greater need than the other, serve the clients to best fit their needs. However, you cannot favor one county over the other, it needs to be that the client need calls for the flexibility in the units, not the agency.

7. Can we pay for cleaning fees for a unit?

- a. If a landlord has the non-refundable cleaning fee, you can use MDHHS grant funds to cover the cost as part of the security deposit if it is required for moving in. However, payment for the security deposit plus the cleaning fee cannot exceed the amount of 1 ½ month's rent. If the cleaning fee is a cost for when the client moves out of the unit, it can be charged as a "damage" fee which cannot exceed one month's rent (including all other damages). Note that damages are a 1 time per lifetime of the grant per client expense.

8. For a household to qualify as chronically homeless, does the head of household need to have the disability or can one of the children or other adult (not head of household) have the disability to qualify as chronically homeless?

- a. The head of household must be the person with a disability. However, the household can identify who they want to be their head of household. Note that the head of household must be an adult, unless there are no adults present.

9. What do we do if our client doesn't want monthly case management?

- a. HUD requires that at minimum, case management is provided monthly. However, clients are not required to participate in case management to receive assistance under the grant (services must be voluntary). You cannot exit a client for not participating in case management. Document your attempts at monthly case management for compliance purposes.

10. What if the HQS inspection is not conducted annually?

- a. HUD requires that HQS inspections be conducted every 365 days. The inspections are 365 days from the initial inspection, not a reinspection. If you are unable to conduct the annual HQS inspection for a unit within 365 days, you must document the reason, which may be that the client was unavailable. As long as there was cause for the delay and it was documented, you remain compliant with regulations.

11. Who do we contact for HQS Inspection training?

- a. Ann Mueller from MSHDA schedules and conducts HQS trainings. Contact her at amueller@michigan.gov to be notified of the next training. MDHHS will also notify partner agencies when we receive notice of scheduled HQS trainings.

12. If a client is pregnant but doesn't have any other children, do I complete the F-SPDAT?

- a. Yes. Clients that are pregnant are considered a family.