The purpose of this letter is to provide claiming instructions for the implementation of the new Home Safe program. This program is a county/tribal optional program specifically designed to support the safety and housing stability of Adult Protective Services clients. A total of $15 million General Fund was appropriated for this program over a three-year period, through June 30, 2021. Program implementation guidelines and a request for proposals related to the Home Safe program were transmitted through an All County Welfare Directors Letter dated October 22, 2018.
The purpose of this letter is to provide County Welfare Departments and California federally-recognized tribal governments with claiming instructions for implementation of the Home Safe program. The Home Safe program was created through AB 1811, the Fiscal Year (FY) 2018-19 Human Services Omnibus Trailer Bill, and its program requirements are outlined in W&IC sections 15770 and 15771. A total of $15 million General Fund was appropriated for this program over a three-year period, through June 30, 2021. Guidelines for programmatic implementation and submission of county and tribal plans related to the creation of local Home Safe programs were provided through the Home Safe ACWDL dated October 22, 2018.

Program Background

The Home Safe program is a county/tribal optional program specifically designed to support the safety and housing stability of Adult Protective Services clients who are experiencing homelessness or are at imminent risk of homelessness due to elder or dependent adult abuse, neglect, self-neglect, or financial exploitation. The program will
provide housing related assistance, interventions, and services using evidence-based practices for homeless assistance and prevention.

Counties and tribes interested in applying for Home Safe program funding were required to submit a program application to California Department of Social Services (CDSS), which has been evaluated on a competitive basis according to the criteria set forth in the Home Safe ACWDL. As Home Safe is a pilot program, participating agencies will be expected to provide timely, quality data regarding program objectives to help inform the evaluation and development of the Home Safe program and other current and future housing initiatives. Approved counties and tribes will receive their allocation amounts through a forthcoming letter. Counties and tribes that were not accepted into the program this year will also receive notification.

Home Safe Program Match Policy and Guidelines

Counties and tribes that have been allocated Home Safe program funds must match the state funding on a dollar-for-dollar basis over the award period in order to draw down those funds. Counties and tribes may meet their Home Safe match requirement through both an expenditure of their own funds exclusively on the Home Safe program or through contribution of county/tribal and/or third party in-kind donations to the program. These match amounts must be spent on or contributed in direct support of the Home Safe program. Per W&IC section 15771(f), any Home Safe funds received in accordance with this match policy must supplement and not supplant existing local funding spent for these purposes.

More detail regarding Home Safe match guidelines, including requirements and provisions, definitions of expenditure and in-kind matches, and examples of potential match sources may be found in the attachment to this letter (which are also identified in Attachment Three of the Home Safe ACWDL). Match documentation requirements and procedures are found in the “Match Documentation” section on page four of this letter.

Claiming Instructions

The following Program Code (PC), Time Study Code (TSC), Program Identifier Numbers (PINs), and Direct to Program (DTP) code have been established for the claiming of Home Safe expenditures:

<table>
<thead>
<tr>
<th>PC</th>
<th>TSC</th>
<th>PIN</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>766</td>
<td>7661</td>
<td>766002</td>
<td>Emergency Shelter Care</td>
</tr>
<tr>
<td></td>
<td></td>
<td>766003</td>
<td>Transportation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>766004</td>
<td>Health Related Non-Medical</td>
</tr>
<tr>
<td></td>
<td></td>
<td>766005</td>
<td>Housing Assistance</td>
</tr>
<tr>
<td></td>
<td></td>
<td>766031</td>
<td>Contracted Activities</td>
</tr>
<tr>
<td>PC</td>
<td>766</td>
<td>Home Safe</td>
<td></td>
</tr>
<tr>
<td>-----</td>
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<td>----------------------------------------</td>
<td></td>
</tr>
<tr>
<td>766068</td>
<td>Direct Costs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>766088-91</td>
<td>Support Operating*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>766092</td>
<td>Casework – OT/CTO Costs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>766093</td>
<td>Support Staff – OT/CTO Costs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>766094</td>
<td>Start Up/Non-recurring Costs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DTP A94</td>
<td>Home Safe</td>
<td></td>
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</tr>
</tbody>
</table>

The sharing ratio for PC 766 is 00/100/00/00 (Federal/State/Health/County).

* The County must have a Letter of Intent on file with CDSS to use Support/Operating PIN codes (88-91).

Counties will claim (for themselves and on behalf of any tribal partners) all Home Safe expenditures amounts for which they are seeking reimbursement to Home Safe PC 766. Reimbursement for tribal partners may be invoiced to the county with which they are partnered and charged by that county as a direct cost to PIN 766031 (Contracted Activities) in the County Expense Claim (CEC).

It is important to note that approved programs may access the program development fund portion of the allocated funds immediately after notification of allocations for the use of program development activities. Non-time study program development costs are to be claimed to either PIN 766031 (Contracted Activities) or PIN 766094 (Start Up/Non-recurring Costs). The remainder of the allocation will be available to programs upon approval by the CDSS; approval will be granted on a rolling basis once counties demonstrate that required program implementation milestones have been met.

The sharing ratio of PC 766 is 00/100/00/00 (Federal/State/Health/County), which reflects the fact that match amounts are not claimed directly to PC 766 but are instead documented in accordance with the procedures outlined on page four in the “Match Documentation” section.

Costs claimed in excess of a county’s Home Safe allocation will be shifted to 100 percent county only funds via State Use Only code 767 (Home Safe – Overmatch).

**Time Study Instructions**

Counties should claim time spent on administrative activities associated with the Home Safe program to TSC 7661. The following is a description of the TSC 7661 (Home Safe):

**CODE 7661 HOME SAFE**

For counties with Home Safe plans approved by CDSS, this code captures county activities associated with the Home Safe program. These activities include, but are not limited to, prioritization and assessment related to Home Safe, including diversion and...
prevention services, housing related case management including housing stabilization and navigation, referrals to homelessness services within the community, administering housing related financial assistance, and providing other services and/or supports to Home Safe clients for the purposes of Home Safe and consistent with Welfare and Institutions Code sections 15770 through 15771.

Eligible activities will also include those associated with and required by CDSS in consultation with a contracted independent evaluation and research agency. Additional information pertaining to activities associated with the research component of Home Safe and the associated claiming will be released in forthcoming county correspondence.

**Match Documentation**

As explained above, counties should claim to PC 766 only the amount of Home Safe expenditures for which they (together with any tribal partners) are seeking reimbursement. Counties separately track and document the county’s match amounts, both expenditure and in-kind, that support the drawdown of those funds in the Claim Notes and Extraneous sections of the CEC, providing the details outlined in this section. It is important to reiterate that such amounts must follow the match guidelines described above and in Attachment Three of the Home Safe ACWDL.

The county (in concert with any tribal partners) must provide documentation of match amounts that correspond to all Home Safe expenditures for which reimbursement is claimed, whether that match consists of:

- **Expenditure Match:** County/tribal funded expenditures spent exclusively the Home Safe program to serve as a match (i.e. for which reimbursement will not be sought);
- **County/Tribal In-kind Match:** County/tribal expenditures for other programs that also count toward the county’s/tribe’s Home Safe match requirement;
- **Third Party In-kind Match:** Third party in-kind donations/contributions that count toward the county’s/tribe’s Home Safe match requirement; or
- Any combination of the above.

The CDSS requires that counties document their Home Safe match amounts in the following ways:

- For county/tribal expenditure match amounts and third party in-kind match amounts, the county must report those amounts to the Extraneous section of the CEC and document the details of the match amounts in the Claim Notes section of the CEC.
- For county/tribal in-kind match amounts, the county must document the details of the match amounts in the Claim Notes section of the CEC.
The Home Safe match section of the CEC Claim Notes must document the following details for each source of match (expenditure, county/tribal in-kind, and third party):

- Program for which match is being documented (in this case, Home Safe).
- Name (and any other relevant identifying information) of the source of match.
- Type of match (expenditure match, county/tribal in-kind, or third party in-kind).
- Description of the match (personnel, office space, etc.)
- Amount of match value reported.
- Any other relevant or qualifying information.

Counties (along with any tribal partners) that receive Home Safe funding will be required to claim all costs on a quarterly basis by performing time studies and utilizing the appropriate direct charge PIN code. Home Safe funds must be expended by the end of the award period. Counties and tribes will be required to provide evidence that their Home Safe match reconciles with their approved county plans as well as the amount of Home Safe funds claimed over the entire period of the award. However, counties and tribes will not be required to provide evidence that the match reconciles on a quarter-by-quarter basis. This allows counties and tribes a degree of flexibility in arranging their match for this program.

It should be noted that it is unnecessary for any particular match amount to directly correlate to any particular expenditure, either in terms of amount or type of expenditure. For example, a contribution of services or tangible goods may be used to match administrative time spent on the program, or vice versa. If time is used as a match, care must be taken to correctly calculate the value of that time so that the match may be appropriately documented. Counties must determine the full cost of such time, counting not only salary costs but also overhead assigned to that time through the time study hour cost allocation process.

Counties will be responsible for ensuring that adequate documentation of Home Safe matching amounts and sources are provided and maintained. The CFL No. 02/03-33 explains, with respect to in-kind match contributions, the county “will be responsible for ensuring the proper audit trail exists and must provide the documentation in the event of an audit or upon request by the CDSS.” If counties fail to provide adequate documentation, claims for Home Safe reimbursement amounts may be disallowed by CDSS. Counties and tribes must maintain applicable records in compliance with the guidance set forth in ACL No. 15-26, which contains additional information regarding record retention requirements. County expenditures and match reporting in relation to this program are subject to onsite fiscal monitoring or audit.

This method of claiming and match documentation follows the same general pattern as that of similar dollar-for-dollar match housing programs, such as Bringing Families Home and the Housing and Disability Advocacy Program (refer to CFL No. 17/18-79 and CFL No. 18/19-25).
Contact Information

Counties may direct any fiscal related questions to the Fiscal Policy and Analysis Bureau at Fiscal.Systems@dss.ca.gov. For programmatic questions regarding the Home Safe program please contact the Housing and Homelessness Bureau at Housing@dss.ca.gov.

Sincerely,

Original Document Signed By:

SALENA CHOW, Chief
Fiscal Forecasting and Policy Branch

Attachment
Home Safe Program
County/Tribal Match Funding Guidelines

Note: These guidelines mirror those of Attachment Three of All County Welfare Directors Letter dated October 22, 2018.

Counties/tribes in receipt of Home Safe funding are required to match the state Home Safe Program funding on a dollar-for-dollar basis over the award period. The county/tribe may meet their Home Safe match requirement through an expenditure of county/tribal funds and/or through a contribution of county/tribal and/or third party in-kind donations. These match amounts must be spent on or contributed in direct support of the Home Safe program.

For example, if a county/tribe claims $500,000 in Home Safe program state funds, the value of its entire Home Safe program outlays, including all expenditures and contributions made on the program’s behalf, must be $1,000,000. This document summarizes the county/tribal match guidelines associated with Home Safe, outlines the general match provisions, how in-kind funding may be used as a match, and defines the items prohibited from being used as a match.

In accordance with Welfare and Institutions Code (W&IC) section 15771(f), counties/tribes in receipt of funds provided for Home Safe shall supplement and not supplant the level of county/tribal funding spent on these purposes in Fiscal Year 2017-18.

Match Requirements

Proper documentation should be kept on file at the county/tribal office that submits all Home Safe program match documentation and expenditure claims. This information must be available at CDSS’ request for review of compliance with statute and state guidance.

General Provisions

County/tribal matching amounts must conform to the following general provisions:

- Are verifiable from the County Welfare Department’s or Tribal Agency’s records.
- Are necessary and reasonable for accomplishment of the Home Safe program’s objectives.
- Are allowable under the cost principles outlined in Subpart E of Title 2 Code of Federal Regulations Part 200, to the extent they consist of federal funds.
- Are neither state funds nor any funds provided by the county/tribe as a match to draw down state funds in another program.

Expenditure Matches (Cash Matches)

A direct and exclusive expenditure of county/tribal funds on the Home Safe program may be used to meet all or part of a county’s/tribe’s match requirements for the Home Safe program.
The source of county/tribal funds used for these expenditures may be the county's/tribe's own public funds (including Local Revenue Funds [LRF]), cash donations from third parties (e.g. partner organizations), or independent grants. The use of cash donations and grants should adhere to the following guidelines:

- These funds should be transferred to and spent directly by the county/tribe exclusively on the Home Safe program to be considered a county/tribal expenditure match. Funds spent by a third party on behalf of the Home Safe program are considered an in-kind donation and must follow the rules for in-kind contributions under this program.
- The third party may place a condition or restriction on the use of funds it donates to the county/tribe requiring that they be used for the purpose of the Home Safe program.
- It is permissible for donated funds, if not completely expended by the county/tribe, to revert to the donor, if this condition is part of the agreement between the donor and the county/tribe.

It is important to note that an expenditure of funds by the county/tribe on behalf of another program that is used as match for the Home Safe program is considered a county/tribal in-kind match, not an expenditure match.

**In-Kind Matches**

In-kind contributions/donations of goods, services, and other resources in support of the Home Safe program may be allowable to meet all or part of the Home Safe county/tribal match requirement. In order for in-kind donations to qualify as allowable match, they must be substantiated with written documentation provided on the source entity’s letterhead and signed and dated by an authorized representative of that entity. Documentation must include:

- Description and value of the donated goods or services.
- Specific date and fiscal year for which the goods or services will be contributed.
- The method used to determine the value of the donation.

**County/Tribal In-Kind Match**

As explained above, state funds are not an eligible match source. County/tribal funds that are used as a match to draw down state funds in another program also may not be used as a match. However, county/tribal funds (including LRF) that 1) are not used as a match for state funds in another program and 2) are spent on other programs may be used as an in-kind match, as long as those expenditures are in support of the Home Safe program. County/tribal in-kind match may also include the value of any resources donated by the county/tribe to the Home Safe program.

Likewise, any federal share of expenditures for county/tribal, state, or federal programs also may be used as an in-kind match, as long as they support the Home Safe program. Any federal funds used as a match must be expended in a manner consistent with federal regulations and the federal award’s terms and conditions.
Potential federal funds/grants/awards that may serve as a match for Home Safe include, but are not limited to, the following sources:

- Emergency Solutions Grant
- Community Services Block Grant
- Community Development Block Grant
- Whole Person Care
- Homeless Continuum of Care
- The Medicaid/Title XIX portion of Health-Related Adult Protective Services (APS) clients.

**County/Tribal In-Kind Match Examples**

Assuming all other match requirements are met, examples of county/tribal in-kind contributions that may be eligible as a match for the Home Safe program include, but are not limited to:

- County/tribal funded salaries and administrative costs of APS programs, such as caseworker or other staff time, provided to Home Safe program participants. Note: Other staff time, including the time of staff not solely dedicated to Home Safe, such as time spent coordinating with local housing services, or other Home Safe program related functions may also be used as match in an amount commensurate with the time spent for Home Safe specific clients and activities.
- County/tribal and federal funds expended under other programs on housing assistance for Home Safe program participants.

For example:

1. The county/tribe establishes specific positions dedicated to provide Home Safe program case management for APS Home Safe program participants. The case worker time is funded by the county/tribe. The value of the time can be used as match.

2. A county/tribal APS social worker spends time coordinating with the local housing authority on program participants’ case plans and providing information to support housing plan development. Both the LRF (2011 Realignment) and Title XIX federal portions of the costs associated with that time can be used as match.

3. An alternative county/tribal program uses county/tribal or federal funds on emergency or interim housing (i.e. shelter beds, motel vouchers, rehabilitative care, etc.) for APS clients served by the Home Safe program. The value of the housing can be used as a match.

**Third Party In-Kind Match**

If the source of the in-kind contribution is a third party, a memorandum of understanding (MOU) between the county/tribe and the third party must be in place prior to the provision of the goods and/or services. The MOU must contain the following elements:

- A commitment to provide the goods/service(s).
• A description of the specific goods/service(s) to be provided.
• The profession of any persons providing service(s) and fair market value of the goods/service(s).
• The timeframe in which the goods/service(s) will be provided.
• The review process or system that will be used to evaluate and document the nature and value of the goods/service(s) as actually provided.

Under an agreement with the county/tribe, a third party may make an in-kind donation contingent upon the receipt of partial reimbursement for that donation from the county/tribe. The county/tribe may consider reimbursement of that amount to the donor as an expenditure under the Home Safe program, which the county/tribe may use to draw down state Home Safe program funds. For example, if a third party were to request reimbursement of half the value of its donation, one half of the total value (the reimbursement) would count as a county/tribal expenditure eligible to draw down state funds and the other half would count as the match for that expenditure.

Third Party In-Kind Match Examples

Assuming all other match requirements are met, examples of third party in-kind contributions that may be eligible as a match for the Home Safe program include, but are not limited to:

• Use of county/tribe third party partner case worker (or other staff) time such as caseworker or other staff time, provided to Home Safe program participants. Note: Other staff time, including the time of staff not solely dedicated to Home Safe, such as time spent coordinating with local housing services, or other Home Safe program related functions may also be used as match in an amount commensurate with the time spent for Home Safe specific clients and activities.
• Third party funds expended on housing assistance for Home Safe program participants.

For example:

1. The county/tribe works with a third party to establish specific positions dedicated to provide Home Safe program case management for APS Home Safe program participants. The case worker time is funded directly by the third party. The value of the time can be used as match.

2. A county/tribal APS program partners with a third party, and a staff person with the third party spends time coordinating with local housing partners on program participants’ case plans and providing information to support housing plan development. Time spent on Home Safe participants for the specific purposes of Home Safe can be used as match.

3. The county/tribe secures (or plans to secure) third party in-kind funds for emergency or interim housing (i.e. shelter beds, motel vouchers, rehabilitative care, etc.) for APS clients served by the Home Safe program. The value of the housing can be used as a match.