

PATH Program Required Documentation

November 17, 2020

INSTRUCTIONS:

- This document is intended to assist PATH projects to prepare for monitoring. For a complete list of all standards assessed during monitoring see the [DMHAS PATH Monitoring Guide](#).
- *Section One* indicates with “X” which documents PATH projects are required to maintain for each of these types of participants:
 - Enrolled participant receiving full case management services
 - Enrolled participant not receiving full case management services¹
 - Participants who are contacted by a PATH worker but not enrolled
- *Section Two* provides a check list of required policies and other documents not specific to a particular participant that PATH projects are required to maintain in their project files.
- *Section Three* provides links to required forms, sample forms and other guidance.

SECTION ONE – PARTICIPANT DOCUMENTATION

Document Type	Enrolled participant receiving full case management services	Enrolled participant <u>not</u> receiving full case management service	Participants who are contacted by a PATH worker but not enrolled
<i>Documentation Related to Participant Eligibility</i>			
Documentation that participant is determined or suspected to be experiencing serious mental illness OR co-occurring serious mental illness and substance use disorder	X	X	
Documentation of attempts to obtain third- party verification of disability	X	X	

¹ PATH projects without sufficient staff to provide full case management services (i.e., including needs assessment and service planning) to all enrolled participants may seek approval from DMHAS for limiting the number of participants for whom the project provides these services. That number must be documented on the outreach plan. The outreach plan must be approved by DMHAS.

Document Type	Enrolled participant receiving full case management services	Enrolled participant <u>not</u> receiving full case management service	Participants who are contacted by a PATH worker but not enrolled
Documentation of referrals to appropriate services for participants determined to be ineligible for PATH services			X
<i>Supportive Services Related Documentation</i>			
Documentation of contacts and contact attempts, including participant locations.	X	X	X
Assessment & Service Plan completed within 30 days of project enrollment and updated at least every 6 months	X		
Case notes or other documentation indicating provision of services or attempts including assistance with housing, mainstream benefits, and linkages to community-based services	X	X	
Releases of Information for HMIS and all collateral contacts	X	X	
<i>Discharge Related Documentation</i>			
Discharge summary or other documentation of the reason for the discharge and that participant was connected to appropriate ongoing services in advance of planned discharges	X	X	
Aftercare documentation indicating at least monthly attempts for 3 months to assess on-going service needs and connect to services as necessary	X	X	
<i>Additional Documentation Requirements</i>			
Reasonable Accommodation Requests – Retain all related records	X	X	X
Grievances/Appeals – Retain all related records	X	X	X

SECTION TWO: CHECK LIST OF REQUIRED POLICIES AND OTHER DOCUMENTS NOT SPECIFIC TO A PARTICULAR PARTICIPANT

Required Policies

- Policies indicating full compliance with all federal and state **nondiscrimination** laws and with the rules and regulations governing fair housing and equal opportunity in housing and employment, including reasonable accommodation provisions
- Policies requiring staff and Board members to disclose **conflicts of interest** and prohibiting financial interest or benefit from PATH assisted activity on the part of staff, persons with whom the staff member has immediate family or business ties, and Board members during his/her tenure with the organization and one year following his/her tenure
- Code of conduct** defining agency expectations around staff conduct, including guidance on professional boundaries
- Policies to ensure that all participant records containing identifying information are kept secure and all information is handled in a manner that protects participant **confidentiality**
- Educational rights & services policies** to ensure that participants are helped to understand their educational rights, to ensure that children and youth are immediately enrolled in school & that they are connected to educational services to help them succeed in school
- Grievance** policy defining a process that is accessible to participants with low literacy levels and other barriers. Must be posted in an area that is readily visible to project participants who are receiving services at the agency offices.
- Staff safety** policy that covers situations likely to be encountered by outreach workers and includes keeping informed about where each worker will be and when, working in pairs whenever possible and in all situations determined to be high-risk, and guidance on environmental scans and situations workers should avoid
- Incident reporting and management** policy that defines an incident and outlines procedures for incident reporting, review and follow-up

Emergency/Disaster Preparedness and Response Plan (see monitoring Guide for details)

Infection Control Protocols (see monitoring Guide for details)

Other Required documents

Submission to DMHAS/SAMHSA of **Intended Use Plan (IUP)** is required annually.

Submission to DMHAS/SAMHSA of **PATH Annual Report** is required annually.

In advance of monitoring, submission to Housing Innovations of **active participant lists generated via HMIS and DDAP** is required.

If the project is unable to comply with any standards outlined in the monitoring guide documentation of efforts to negotiate **alternative service standards** with DMHAS is required.

Outreach Plan - requires PATH supervisor review and updates monthly, and CAN and DMHAS approval every 6 months

Submission to Housing Innovations of statewide **standard consumer surveys** is required annually.

Documentation that outreach workers participated in at least **12 hours of training** per year on topics relevant to provision of street outreach services.

Form that tracks and aggregates housing placements at least annually

If the project is a collaboration between two or more agencies that are receiving PATH funding as either a recipient or subrecipient, a Memorandum of Agreement or similar document that clearly outlines the roles and responsibilities of each partner

SECTION THREE: RESOURCES

General Resources

- [DMHAS PATH Monitoring Guide](#)
- [Instructions for Generating an Active PATH Client List in HMIS](#)
- [Outreach Plan Template](#)
- [Sample Completed Outreach Plan](#)

Participant Eligibility Resources:

- [Disabling Condition Verification Form](#)

Sample Policies

- [Sample Educational Rights and Services Policy](#)

Supportive Services Related Documentation

- [Assessment and Service Plan Form](#)
- [English Consumer Survey](#)
- [Spanish Consumer Survey](#)
- [Sample Housing Placement Tracking Tool](#)
- [HMIS Release of Information \(ROI\) - English](#)
- [HMIS Release of Information \(ROI\) - Spanish](#)
- Sample Release of Information in English and Spanish: [DMHAS HIPAA RVS](#)