

Janet T. Mills
Governor

Sara Gagné-Holmes
Acting Commissioner



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August 5, 2024

Simonne Maline, Executive Director
Consumer Council System of Maine
219 Capitol St, Suite 7
Augusta, ME 04330

Dear Ms. Maline,

Thank you for your issue statement dated June 28, 2024, regarding accessibility issues and concerns with the current BRAP application. The primary issue pertains to comprehensive provision of and access to current BRAP applications, and secondarily, improvements with the application itself. The Department is aligned with the Council on the need to assure widespread access to BRAP applications and housing assistance resources throughout the state and continuously works to effectuate this.

The Council's first recommendation is to have a centralized website for accessing a current BRAP application.

- An updated BRAP application is under final review and is anticipated to be published and publicly available soon. The CAA, LAA, and DHHS will all have the same, current application posted to their respective websites once the newest version has been finalized.
- We acknowledge that the currently published application contains discrepancies in the dates on some forms. This is due to the various forms being updated at different times, resulting in the variation of publishing or revision dates shown for those individual forms opposed to the entire BRAP application.
- The Department had explored centralizing the applications with Shalom previously; however, it was reported that one centralized location for the application was ultimately a disservice to applicants and it was requested that the application be published on all relevant agencies' websites. If the Council feels one centralized location is preferable, it may be recommended that they study and survey those most affected by the BRAP program (e.g., providers, clients, and others, as applicable) to determine consensus on the best approach. Similarly, the Council and our other partners in the community, including advocates like DRM, could add links to all the sources of the BRAP application to their sites and other materials as supplemental hub locations for these resources, further expanding access to those in need of such assistance.

The Council's second and third recommendations is an openly accessible option to complete the application online that is also centralized, and for subcontractors to have a current link to the "one-stop hub."

- Shalom has advised the Department they may be able to offer a fillable PDF; however, we feel it's important to note that these forms are often more complex and may be more challenging to revise going forward which may result in unintended delays or complications with future updates.
- Links to the new BRAP application can further be distributed to all relevant subcontractors for publishing on their sites and for provision of additional copies.
- Please refer to the above response regarding one centralized location and our recommendations to the Council.

The Council's fourth recommendation is provider access to necessary technology to facilitate the successful completion of housing applications "on the spot."

- LAAs provide applications in person, by mail, and distribute copies to providers upon request or inquiry. They regularly strive to ensure applications are as available as possible to whomever may need one, directly or indirectly.
- We appreciate the recommendation for the incorporation of technological assistance in these outreach efforts but respectfully advise that there are often resource challenges, such as the provision of tablets or laptops for all staff working with individuals seeking housing assistance. As stated in our encampment response, there are numerous individuals providing this service, including PATH team members and other community support workers.

The Council's fifth recommendation is for all service providers to automatically offer housing applications and resources to every person they serve, and a comment that individuals should not have to seek out that information.

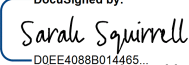
- OBH staff is confident this happens in practice and have not received complaints or constituent concerns regarding LAA staff or others refusing or delaying applications, not responding to questions, or not providing guidance on the program and resources available. For example, Shalom House has a folder of paper copies on hand at reception as a walk-in resource with relevant eligibility and process information, as well as FAQs online. The LAAs likewise answer any questions received about the program, offer assistance with applications, and provide other guidance to individuals by phone, mail, or in person.
- As stated above, PATH teams also continue to distribute applications as well as other providers, advocates, and entities or individuals who assist persons in need of housing assistance and resources.

The Council's sixth and final recommendation is that no one should have to wait for or require a case manager to apply for BRAP if the eligibility criteria is met.

- BRAP does not turn anyone away nor delay an application if they do not have a case manager. In practice, the CAA does not require a case manager and often reviews and awards applications submitted by individual applicants. The applicant must have a diagnosis verification and LOCUS, which requires access to a provider, and may have been inadvertently interpreted as a requirement for a case manager. If the applicant is on their caseload, the LAA can also directly provide this information. Furthermore, LAAs and PATH can also perform the LOCUS, and have done so on numerous occasions. We do note, however, that it may take time as they are still required to confirm the diagnosis and Section 17 eligibility criteria if the applicant is not already receiving services from their agency.
- The BRAP program does require verification of a non-excluded serious mental illness (SMI) diagnosis and Section 17 eligibility, in addition to any risk factors associated with such diagnosis. As a result, the program cannot approve applications that do not meet these requirements.

The Council's expected outcome is the provision of greater and easier avenues to access all housing applications. The Department ensures that housing applications are widely available through our own site(s) as well as through our partners, providers, and others in the community, but acknowledges that access improvements may still be possible. We encourage the Council and their community and advocate partners to identify other areas and interested entities that may wish to make additional applications available, and those copies can be obtained from the resources provided by OBH, Shalom, and our LAAs' sites. Once the newest BRAP application has been finalized it will be published to all relevant sites, available in paper copy, and for further distribution upon request or inquiry. If the Council and/or other interested parties would like to be notified once the new application is available, please let us know and we will provide such notice accordingly.

Sincerely,

DocuSigned by:

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Sarah Squirrel

Director

Office of Behavioral Health

Maine Department of Health and Human Services