



Chronically Homeless Definition and Documentation

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Logistics

- All callers are muted upon entry
- If you need help or have a question please put it in the Chat box
- If you need help and the chat box is not working for you please email Gordon at GLEvine@lhc.la.gov

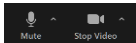
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Zoom Controls on Zoom Panel

Typically on the bottom of the screen

- Mute and Stop Video – gives you control of sound and picture



- Participants – see your peers on the call




- Chat – talk with your peers on the call



- Reactions – emojis to respond to questions





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Agenda

- ➔ 1. Welcome and Introductions
- ➔ 2. Chronic Homelessness Definition
- ➔ 3. Recordkeeping
- ➔ 4. Other Useful Eligibility Information
- ➔ 5. Questions and Wrap-up






POLL QUESTION



Q1: What is your experience with documenting chronic homelessness status for people?

- ▶ Expert
- ▶ Very familiar
- ▶ Somewhat familiar
- ▶ Some, just starting to learn about it
- ▶ I don't have any yet, but willing to learn





During this Training

<p>WE WILL COVER</p> <ul style="list-style-type: none"> ▪ Definition of Chronically Homeless ▪ Documentation Standards ▪ Examples of Documentation 	<p>NOT COVERING DURING THIS SESSION</p> <ul style="list-style-type: none"> ▪ Full PSH eligibility criteria and documentation requirements ▪ DedicatedPLUS ▪ Coordinated Entry System (CES) Prioritization
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Permanent Housing Types

Permanent Supportive Housing (PSH)

- Long-term housing assistance where supportive services are provided to assist individuals or families experiencing homelessness with a disability to live independently
- Assistance can only be provided to individuals and families experiencing homelessness in which one adult or child has a disability

Rapid Re-Housing (RRH)

- Tenant-based rental assistance for up to 24 months
- Supportive services to assist program participants to obtain and maintain stability in permanent housing
- In FY 2017 and 2019, significant changes were made to who can be served by a new or renewal RRH project.

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Final Definition of Chronically Homeless

1. A "homeless individual with a disability," as defined in the Act, who:
 - ▶ Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ▶ Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
 - 🔗 Occasions separated by a break of at least seven nights
 - 🔗 Stays in institution of fewer than 90 days do not constitute a break

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Final Definition of Chronically Homeless

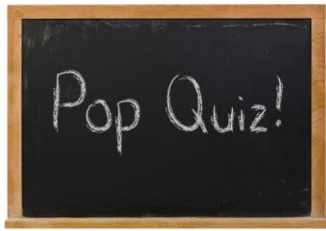
2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility;

or
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless

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Q.2

Chronic Homeless Definition Criteria



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Recordkeeping

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Recordkeeping Requirements

- Recipients and subrecipients must:
 - Obtain documentation from qualified source(s) in accordance with the requirements of the interim rule
 - Maintain the records in your:
 - organization,
 - project, and
 - participant files



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Documenting CH has Two Parts

1. Homeless Status

- ▶ Continuous Homelessness
 - 🔥 12 consecutive months
- OR**
- ▶ Cumulative Homelessness - Episodic with breaks
 - 🔥 12 months over 4 occasions in 3 years
- ▶ Occasion definition
 - 🔥 "A break of at least seven nights not in a literally homeless situation"

2. Disability Status

- ▶ Physical Impairment
- ▶ Mental Impairment
- ▶ Emotional Impairment
- ▶ Developmental Disability
- ▶ HIV/AIDS

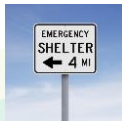
TIP: In an institution for fewer than 90 days is not considered a break!
That time counts towards homeless episode

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Documenting Literal Homelessness for CH Applicants

- Document individual's time in:
 - ▶ A place not meant for human habitation
 - ▶ An emergency shelter, or
 - ▶ A safe haven
- Single encounter in a month is sufficient to consider household homeless for the entire month UNLESS there is evidence of a break



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12 Month Continuous

- Documentation needs to show 12 consecutive months of literal homelessness
- Where to start?
 - ▶ HMIS records – Is there evidence of at least one night of shelter in each month for the last 12 months before project entry?
 - ▶ Contact shelters not participating in HMIS
 - ▶ Outreach Worker – Any contact with outreach staff during the timeframe to fill gaps?
 - ▶ Institution Stays – any stays less than 90 days?
 - ▶ Self-certification



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HMIS/Comparable Database Documentation Examples

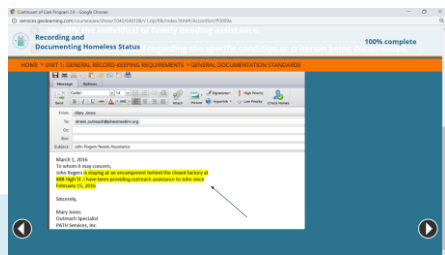
- A single record in a single month of a stay in an emergency shelter or a safe haven or an outreach contact of residing in a place not meant for human habitation counts for the entire month unless there is clear evidence of a break.
- Entire period of homelessness based on records contained in HMIS or a comparable database.

EXCEPTION: Self-reported data contained in HMIS or a comparable database **DOES NOT** qualify as third-party documentation.

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Question: How many months of homelessness does this document?



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Documenting Breaks

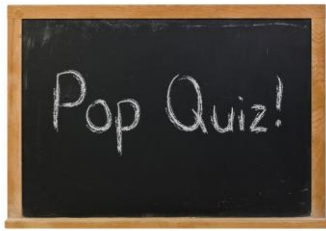
- Evidence of a break can be documented by:
 - ▶ Third party evidence
 - ▶ Self-report of the individual seeking assistance
 - ▶ 100% of the breaks can be documented by self-report

TIP: In an institution for fewer than 90 days is not considered a break! The time counts towards homeless episode

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Q.3

What is considered a break?





Documenting Disability for PSH

- PSH projects may only accept individuals with a qualifying disability or families where one member of the family has a qualifying disability*
 - Disability documentation must be third-party and must be documented by:
 - A professional licensed by the state to diagnose and treat that condition **OR**
 - Social Security Administration (SSA) for persons receiving disability benefits
-  SSA/SSDI check

**For projects dedicated to serving individuals and families who are chronically homeless, an adult must have the qualifying disability (if no adults present it may be minor with qualifying disability)*





Documenting Disability for PSH (cont)

- Intake staff observations
 - Only acceptable in the absence of third-party verification and must be confirmed and accompanied by written third-party verification no later than 45 days from initial intake.
- Oral third-party and self-certification are not appropriate for documenting disability.
- If participant is deemed eligible because of developmental disability or HIV/AIDS, not required to pass the 3-part test for disability.





Monitoring Findings: Eligibility Documentation



- All CoC Program files need to have documentation of homeless status
- All PSH files need to have documentation of disability status
- Example compliance issues:
 - Homeless status documentation is missing dates, signatures and it does not have clear descriptions of living situation being one of HUD's eligible places
 - Unclear chronology when documenting chronic homelessness episodes
 - Missing documentation of due diligence attempts to get third-party documentation
 - Disability not documented or signed by a person not credentialed to make a diagnosis





Recap Major Items

- Documenting chronic homelessness is a two-part process
- 12 months of documented homelessness for either continuous or episodic homelessness
- Episodic homelessness needs to have 4 occasions within 3 years
- Occasions are defined as a break of at least seven nights not in a literal homeless situation
- Fewer than 90 days in an institution is not considered a break





Homelessness Documentation All Project Types





Documentation Review – Point-In-Time

Review documentation:

- ✓ At referral (if applicable to your CoC process)
- ✓ At intake by project accepting referral
 - Determine what documents are needed
- ✓ At project entry
 - Ensure documentation is within the required timeframe
 - Due to possibility of long documentation gathering process, households qualifying as episodic need to make sure the 3 year look back is applicable from the project start date





General Documentation Standards

1. Identify the entity or party providing the information
2. Identify the individual or family needing assistance
3. Provide sufficient detail regarding the specific condition or criterion being documented.

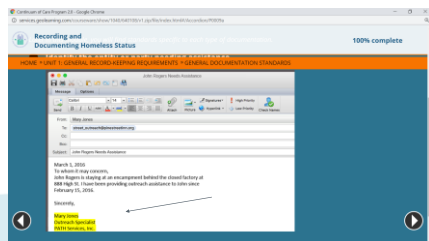


STANDARDS





Example: Identify the Staff



TAC
Tennessee ACCESS

Example: Identify the Applicant

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TAC
Tennessee ACCESS

Example: Identify the Details


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TAC
Tennessee ACCESS

Preferred Order of Documentation

- In order of preference
 1. Third-party documentation
 2. Intake worker observations
 3. Certification from the person seeking assistance
- Due diligence documentation if 3rd party or intake worker observations are not available
- Appropriate documentation will vary depending on
 - ▶ Type of assistance provided
 - ▶ Circumstances of the potential program participant,
 - ▶ Already available documentation
 - 🔗 Discharge paperwork
 - 🔗 HMIS service transactions

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3rd Party Documentation - Requirements


1. Document must be identifiable as coming from the 3rd party source.
2. Document must be signed and dated by the third party (as applicable)
 - ▶ Example: an email with staff name and details is a type of signature
3. **The request for documentation does not jeopardize the health or safety of the individual or family**

EXAMPLES

- ▶ Letterhead of agency
- ▶ Email that shows the agency email address
- ▶ Forms containing the agency identification

TIP: Add a "Print Name" line if signatures are not legible

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3rd Party Documentation - Examples

An individual record of a stay in an emergency shelter, a safe haven, or from a street outreach contact from an HMIS, or comparable database used by victim service or legal service providers	A written observation by a community member that has observed where the individual or head of household was living or is currently living
A written observation by an outreach or intake worker of encounters with the individual or head of household that includes a description of the conditions where the individual or head of household was living or is currently living	A written referral by another housing or service provider

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3rd Party Documentation – Oral Verification

- Oral Verification Standards
 - ▶ Identity of the 3rd party providing the oral verification
 - ▶ Date the oral verification was received
 - ▶ Identity of the intake worker recording the oral statement
 - ▶ Intake Worker certification the statement is true and complete which includes signature with date

Option to mitigate breakdowns in process of exchanging paper or email verifications

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Documentation Examples

- 3rd Party Documentation
 - ▶ Person must have physically observed where the person is residing. It must be a written observation of encounter at the location.
- Written observation (2nd order priority)
 - ▶ Where an intake worker's only encounter for the month is at the point in which they are seeking service assistance, the staff documentation will not qualify as third-party documentation of living situation

EXAMPLES

- ❖ June 2020 – met at encampment (3rd party documentation)
- ❖ March, August, September 2019 – met at drop-in center or health clinic and self-report to provider (Written observation - 2nd order priority documentation)

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Documenting Institutional Stays

- Discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official stating the beginning and end dates of the time residing in the institutional care facility
- Where the above is not attainable, a written record of intake workers due diligence to obtain AND the individual's self-certification that he or she is exiting an institutional care facility where resided less than 90 days



Institute

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Documenting Self-Certification

- Staff can assist applicants in documenting their homelessness
 - ▶ Describe the qualifying homeless situation
 - ▶ Identify head of household
 - ▶ Signed and dated as true and complete (*unless VSP provider*)
- Must document the attempts to get 3rd party documentation (*due diligence*) before using self-certification
 - ▶ *NOTE: Intake worker must never contact someone for third-party documentation if the individual or family believes that their health or safety will be jeopardized by contacting that person*
- Some PSH projects have caps about how many of the 12 months can be self-certified

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Due Diligence

Staff must make reasonable attempts to get 3rd party documentation

BUT never contact someone for 3rd party if it will jeopardize safety



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Due Diligence Documentation

What is it?

- Documentation that is required if using anything except 3rd party documentation for homeless status
- Documentation that follows your project policy for eligibility determination



How to Document

- Description of the process and steps taken to get 3rd-Party documentation
 - Effort - date, time and any applicable supporting documents
 - Outcome – what happened or didn't happen, obstacles encountered
- Include certification of being true and complete
- Signed and dated by intake worker

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Nuances and Other Information

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Caps on Self-Certification for Dedicated Project Beds

- 3rd Party documentation is always preferred
 - ▶ Must thoroughly document attempts to obtain third-party documentation and why third-party documentation was not obtained if using other methods

- Dedicated beds documentation caps
 - ▶ All participants – up to 3 months can be documented through self-certification
 - ▶ Up to 25% of households served in an operating year can self-certify more than 3 months

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RRH as a Bridge to PSH

- Program participants receiving RRH may maintain their homeless or chronically homeless status if they were homeless or chronically homeless at entry into the project for purposes of remaining eligible for other permanent housing placements (including CoC Program funded PSH).
- The program participants are not, however, considered to be homeless for counting purposes.
- This guidance is further explained in [FAQ 529](#) and [FAQ 530](#).

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Transferring from PSH to PSH

- Once an eligible household is placed in PSH, the household does not retain their homeless or chronically homeless status.
- However, PSH projects may serve individuals and families from other PSH projects as long as program participants originally met the eligibility requirements for the PSH project to which they are transferring at the time they entered their initial PSH project.
- This means that an individual or family may transfer from one permanent supportive housing program to another under the CoC Program.

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Documenting Homelessness

- Recipients must have written policies and procedures that:
 - Require intake staff to document eligibility at intake/screening
 - Specify the evidence to rely upon to establish and verify homeless status
 - Include standards for documenting due diligence
- Standards must be consistent with recordkeeping requirements and reflect HUD's preferred order
- Policies must show:
 - Referrals will come from Coordinated Entry
 - Alignment with CoC Written Standards



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Where to Go for Help

- CoC's Written Standards
- Local Policy and Procedure manual
- Recipient agency if you are a subrecipient
- HUD Exchange FAQs, training materials and sample forms
- Regulation
- Ask a Question (AAQ)
 - <https://www.hudexchange.info/get-assistance>

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Questions?


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HUD Exchange Resource List


- [HUD Exchange Website Home Page](#)
- [CoC Program Page](#)
- [CoC Program Toolkit Page](#)
- [CoC Program Toolkit – Determining and Documenting Homelessness](#)
- [Recording and Documenting Homeless Status](#)
- [Frequently Asked Questions – CoC Program](#)
- [Ask A Question on HUD Exchange](#)
- [Join a Mailing List on HUD Exchange](#)
- [CoC GIS Tools](#)






Chronic Homelessness Resource List

- [Final regulation on the definition of "chronically homeless"](#)
- [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status \(PDF\)](#)
- [CoC Competition Focus: Ending Chronic Homelessness](#)
- [Sample Chronic Homelessness Documentation Checklist](#)
- [View the Defining "Chronically Homeless" Final Rule Webinar, and Frequently Asked Questions \(FAQs\).](#)





Chronic Homelessness Resource List

- **Trainings**
 - ▶ [View the Defining "Chronically Homeless" Final Rule Webinar, and Frequently Asked Questions \(FAQs\).](#)
 - ▶ [Recording and Documenting Homelessness https://www.hudexchange.info/trainings/courses/recording-and-documenting-homeless-status/](https://www.hudexchange.info/trainings/courses/recording-and-documenting-homeless-status/)
- **DedicatedPLUS**
 - ▶ [FY 2018 CoC Competition Focus: DedicatedPLUS - Explaining the New Strategy for Ending Chronic Homelessness](#)

