

Spotlight: Definition of Chronically Homeless



DOCUMENTING CHRONIC HOMELESSNESS STATUS

MARCY THOMPSON
BRETT GAGNON

Recordkeeping Requirements: Overview

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- Third party documentation preferred:
 - ✦ At least 9 months of time homeless should be documented by third party; up to 3 months can be documented by self-certification alone
 - ✦ Where third party absolutely cannot be obtained, up to the full time can be documented by self-certification
 - Provider must document attempts at collecting third party and the conditions the individual or family is living in.
 - No more than 25% of individuals and families assisted in a project can have more than 3 months documented by self-certification
- One documented encounter in a month, assume homeless for entire month unless there is evidence of a break (e.g., a stay in TH)

When is third-party documentation required?

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- Recipient should try to obtain evidence in this order at intake:
 - Third-party
 - Intake worker observation
 - Certification from the person seeking assistance
- If third-party documentation unavailable at intake, up to full period of time homeless can be documented via certification from person seeking assistance
 - Recipient has up to 180 days to obtain third-party documentation
 - Program participants in program fewer than 180 days excluded from 75/25 ratio
 - After 180 days if program participant does not have at least 9 months of third party documentation:
 - Must fall within 25% cap; or,
 - Recipient must discontinue use of CoC Program funds to serve program participant

Acceptable Third-Party Documentation

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- Individual record of a stay in emergency shelter, safe haven, street outreach from HMIS or comparable database
- Written observation from outreach worker of encounters with household and description of where household was residing
- Written observation of community member
- Written referral by another housing or service provider

Guidance on Third-Party Documentation

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- How can HMIS or comparable database count as third-party documentation?
 - Record of each stay in emergency shelter or a safe haven or record of each outreach contact
 - ✦ Only one day in month is necessary to document whole month unless clear evidence of a break (i.e., stay in transitional housing)
 - ✦ For each month of homelessness (in place not meant for human habitation, safe haven or emergency shelter) individual records for each stay or contact would be needed

Guidance on Third-Party Documentation

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- How can encounters with individual or head of household by outreach worker or intake worker be considered third-party documentation?
 - Current occasion: Outreach worker or intake worker must have physically observed where household is coming from
 - Prior months and occasions:
 - ✦ Can document encounters with household that may have been where they were residing or in other location
 - ✦ If not in the actual place where household was residing, outreach or intake worker must state why they believe (based on their judgement) that the household was sleeping in one of the permitted locations
 - ✦ Documentation will have to specify each month in which person was encountered and outreach or intake worker can only document those months in which they encountered the household
 - If current point of intake is the first time the intake worker is meeting household, their observation cannot count towards any but the current month of homelessness and only if they physically observe where household is residing

Guidance on Third-Party Documentation

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- How can a community member, such as shopkeeper or neighborhood resident be third-party documentation?
 - Oral or written observation of someone in community that has physically observed where the household is residing
 - Intake worker must use professional judgement as to whether or not source is reliable

Guidance on Third-Party Documentation

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- Can housing or service provider such as an educator, members of law enforcement, or healthcare professionals serve as third-party source?
 - Does not have to be based on physical observation of where household was residing
 - If professional has encountered household on one or more occasions while in their official capacity and household has reported that during that time they were residing in an eligible location, a written or oral statement could be provided that based on their knowledge, the person was residing in the location as reported
 - Can only count for the actual months in which professional encountered household

Documenting Chronically Homeless Status: Documenting Breaks

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

Documenting Chronically Homeless Status: Institutional Stays

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- 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

Documenting Disability

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- Qualifying disability must be documented by one of the following:
 - Written verification of disability from licensed professional
 - Written verification from SSA
 - Receipt of disability check
 - Intake staff-recorded observation (must be supported by evidence above within 45 days of entry)

Additional Recordkeeping Guidance

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- 100% of breaks (more than 7 nights in a place meant for human habitation or 90 days or more in an institution) can be documented based on self-report of household seeking assistance.
- If third-party documentation not immediately available and provider houses household based on self-certification (and they are under 25% cap), provider should continue to seek third-party documentation over time

Resources

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- Up to date information regarding the McKinney-Vento Act programs and TA materials can be found at <http://www.hudexchange.info>
- Notification of the availability of future information will be released via the HUD Exchange Mailing List. To join the HUD Exchange mailing list, go <http://www.hudexchange.gov/subscribe/maillinglist.cfm> and click on “Homeless Assistance Program”
- Submit Questions to the HUD Exchange Ask-A-Question at:
 - <https://www.hudexchange.info/ask-a-question/>



- Questions/Comments?