



## HUD Final Rule: Chronic Homeless Definition & Recordkeeping

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### Training Objectives

- Understand new definition for Chronically Homeless (CH)
- Understand HUD’s documentation & record keeping requirements

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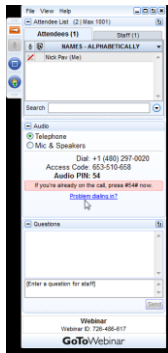
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### Webinar Housekeeping

- Mute
- Audio Troubleshooting
  - If you are having difficulty hearing us, please join the webinar via phone
  - Click on “Audio” and then click “Telephone”. Please follow dial in instructions
- Questions
  - Chat Box



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## CHRONIC HOMELESS DEFINITION



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## OLD Chronic Homeless Definition

An individual is determined to be chronically homeless if they:

1. are living in a place not meant for human habitation *or* emergency shelter
2. have been homeless for at least 1 continuous year or have experienced at least 4 episodes of homelessness in the past 3 years
3. have a documented disability



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## Why Revise the Definition ?

- Consistently use same criteria
- HUD receives consistent and accurate information & data nationwide
- Focuses on persons with the longest histories of homelessness who often have the highest need
- Ensure targeted funds are providing PSH for these individuals and families



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## Public Comment

- 2012-2013: Experts, researchers, and practitioners provided feedback from different points of view during public comment period
- Need for greater clarity
- Establish regulatory definition for the term “chronically homeless”




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## New Chronic Homeless Definition

1. An individual who is homeless and lives in:
  - a place not meant for human habitation;
  - a Safe Haven;
  - an emergency shelter




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## New Chronic Homeless Definition

2. Has been living in this location for:
  - continuously for at least 1 year;
  - on at least 4 separate occasions in the last 3 years where the CUMULATIVE total of the 4 occasions is at least 1 year
    - Stays in institutions of 90 days or less will not constitute as a break in homelessness, but rather included in cumulative total




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### New Chronic Homeless Definition

3. An individual who has been residing in an institutional care facility

- jail;
- substance abuse treatment facility;
- mental health treatment facility;
- hospital

for fewer than 90 days and met the requirements of living in a place not meant for human habitation or safe haven or emergency shelter before entering the facility




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### New Chronic Homeless Definition

4. An individual can be diagnosed with one or more of the following conditions:

- Substance use disorder;
- Serious mental illness;
- Developmental disability;
- Post-traumatic stress disorder;
- Cognitive impairments resulting from brain injury;
- Chronic physically illness;
- Disability




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### New Chronic Homeless Definition

5. A family or head of household (or if there is no family, a minor head of household) who meets all of these criteria, including a family whose composition has fluctuated while the head of household has been homeless




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### Major Changes: Continuously VS Cumulatively

- “Occasion” replaces “episode”
- 12 months CONTINUOUSLY or...
- 4 occasions in the last 3 years CUMULATIVELY TOTAL at least 12 months




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### Major Changes: Break in Homelessness

- No minimum number of days in which each occasion must total
  - Occasions are defined by a break of AT LEAST 7 DAYS NOT residing in an emergency shelter, safe haven, or residing in a place meant for human habitation
- Stays in institutions of fewer than 90 days DO NOT constitute a break and count toward total time homeless




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### Major Changes: Condition VS Disability

- Replaced “disabling condition” with “homeless individual with a disability”
- Individual **MUST** meet the definition of “homeless individual with a disability”
  - “Can be diagnosed” is not included in this final rule
  - Remember that for recordkeeping, documented disability evidence can be recorded *no later than* 45 days of the application for assistance




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## Major Changes: Defining Family

- Family:
  - Group of persons residing together and includes elderly, displaced, disabled, near-elderly
  - Presenting together where head of household meets all the criteria established in final rule
- If there is no adult in the family, the family is still considered chronically homeless IF a minor head of household meets all the criteria




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## Implementation

- CoC recipients must comply with this new rule **AS OF JANUARY 15, 2016**
  - All program participants admitted to the project prior to this date are not affected
- U.S. Interagency Council on Homelessness, Department of Veterans Affairs, and other HUD programs have historically adopted the definition of “chronically homeless”




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## QUESTIONS?




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## DOCUMENTATION & RECORDKEEPING



### Documentation & Recordkeeping Requirements

- Apply to CoC Program-funded PSH that is required to serve the chronically homeless
- Consistent with *existing* recordkeeping requirements
- Maintain consistent documentation practices – intake policy and procedures



### Documentation & Recordkeeping Requirements

Two components of documenting chronic homelessness:

**Length of Time Homeless – including location  
&  
Disability Status**

*Note from HUD: 3<sup>rd</sup> party housing documentation is meant to be interpreted broadly*




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## Length of Time Homelessness

Order of priority for evidence of 12 months of homelessness:

1. **Third-party**
2. **Intake worker observation**
3. **Self-certification from client seeking assistance**




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## Things to Know

- If there is documentation of a single encounter in a month, this is sufficient to consider the household homeless for the entire month
- For all clients, up to 3 months can be documented through self-certification
- If not third party documentation, then:
  - Written record of Intake worker’s due diligence AND
  - Self-certification from client




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## Challenges with Documentation

HUD realizes it can be challenging to document every client’s history of homelessness and in rare and extreme cases the client’s full 12 months can be documented via self-certification, given the following:

- Thorough documentation of attempts to obtain 3<sup>rd</sup> party documentation and WHY it couldn’t be obtained
- Written certification from client is obtained
- No more than 25% of households served in operating year




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## How HMIS can Help

A Policy and Procedure is being created to allow the use of HMIS to document chronic homelessness history.

- Project Type
- Project Entry and Exit Date
- Evidence of Breaks

\*HMIS cannot be used to document disability status




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## Disability Status

- Must be verified by a 3<sup>rd</sup> party
  - Written verification from a licensed professional
  - Written verification from SSA
  - Disability Check
  - Staff-recorded observation that is confirmed within 45 days, with evidence




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## HMIS Data Entry

Chronic Homeless Status: Length of Time on Street, in an Emergency Shelter or Safe Haven

Client entering from the streets, ES or SH  G

If Yes for "Client entering from streets, ES or SH" Approximate date started: [Date Field]  /  /  G

Regardless of where they stayed last night - Number of times the client has been on the streets, in ES, or SH in the past three years including today  G

Total number of months homeless on the street, in ES or SH in the past three years  G

Length of Time Homeless - Status Documented?  G




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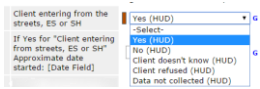
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### HMIS Data Entry



The answer to the first question will determine how you answer the second question. If you answer YES to the first question you are expected to enter a date that confirms when the client started living in a homeless situation.

If you answer No, you will move to the third question.

Breaks can be included in the "LOOK BACK" period, if they are less than 7 nights.

Institutional stays of less than 90 days can also be included, if the client was homeless before entering the institution.



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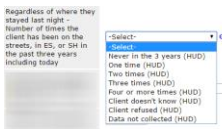
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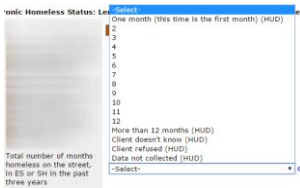
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### HMIS Data Entry



One time should be used to indicate that this is the client's first time experiencing homelessness in the past three years



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### QUESTIONS?



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## Resources

- [Defining "Chronically Homeless" Final Rule](#)
- [HUD Webinar & Fact Sheets](#)
- [CoCPrograms@allchicago.org](mailto:CoCPrograms@allchicago.org)

### HMIS Helpdesk

[hmis@allchicago.org](mailto:hmis@allchicago.org)

[hmis.thechicagoalliance.org](http://hmis.thechicagoalliance.org)



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