

Chronic Homeless Documentation Overview

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Chronic Homelessness Defined

- ▶ People who are chronically homeless have experienced homelessness for at least a year – or repeatedly – while struggling with a disabling condition such as a serious mental illness, substance use disorder, or physical disability.
- ▶ People experiencing chronic homelessness typically have complex and long-term health conditions, such as mental illness, substance use disorders, physical disabilities, or other medical conditions.
- ▶ Once they become homeless — regardless of what immediately caused them to lose their housing — it is difficult for them to get back into housing and they can face long or repeated episodes of homelessness.

HUD's Final Rule on Defining "Chronically Homeless"

- ▶ The Final Rule on Defining "Chronically Homeless" went into effect for the **Continuum of Care (CoC) Program** on January 4, 2016 and HUD expected Permanent Supportive Housing (PSH) providers to begin using it for all new admissions as of January 16, 2016.
- ▶ As of January 16, 2016, any CoC PSH projects required to serve persons that are chronically homeless (either dedicated or prioritized) may only accept new program participants that meet this definition.

To Be Considered Chronically Homeless...

Individual's must meet three requirements:

- ▶ **Literally Homeless (category 1):** Is currently homeless and lives in a place not meant for human habitation, a safe haven, in an emergency shelter, a motel paid for by an agency/charity, or in an institutional care facility for fewer than 90 days and homeless the night prior to entry.
- ▶ **Duration of Homelessness:** at least 12 continuous months or at least 4 separate occasions (or breaks) in the last three years totaling 12 months.
 - ▶ Transitional Housing does not count towards the 12 months of homeless history.
- ▶ **Has a Diagnosable Disability**

What is a Break in Homelessness?

Pertains to 4 separate occasions in the last three years
(must total 12 months)

- ▶ A break in homelessness is considered to be any period of **7 or more consecutive nights** where an individual or family is not living in a place not meant for human habitation or emergency shelter.
 - ▶ If the client resides in transitional housing for longer than 7 days, this is considered a break.
 - ▶ If the client stays with a friend for 6 days, this is not considered a break in their timeline of homelessness.

CoC Dedicated Plus Projects

- ▶ HUD included the option of Dedicated PLUS in the **FY 2017 CoC Program NOFA** for CoC funded PSH.
- ▶ Provides CoCs with more flexibility to serve vulnerable populations and to more effectively and more immediately address the needs of persons experiencing chronic homelessness, at risk of experiencing chronic homelessness, or who were chronically homeless prior to being housed and who have recently become homeless again.
- ▶ Most CoC Program funded PSH projects are 100% dedicated to serving the chronically homeless, but there are few projects that can accept Dedicated Plus referrals, which has slightly different eligibility requirements.

DedicatedPlus Eligibility

Has a **Diagnosable Disability** and meets one or more of the following criteria at **project entry**:

- ▶ Experiencing chronic homelessness;
- ▶ Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- ▶ Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
- ▶ Residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness prior to entering the project;
- ▶ Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
- ▶ Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

What is Considered a Disability?

- ▶ Disability is defined as one or more of the following diagnoses that is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently:
 - ▶ Substance Use Disorder
 - ▶ Serious Mental Illness
 - ▶ Developmental Disability
 - ▶ Post-traumatic Stress Disorder
 - ▶ Cognitive Impairments Resulting From a Brain Injury
 - ▶ Chronic Physical Illness or Disability

Questions?

Documentation

Homeless Documentation Order of Priority:

1. Third-Party (including written and source documentation, and HMIS records)
2. Intake worker observations
3. Certification by the individual seeking assistance, which must be accompanied by the intake worker's documentation of the living situation of the individual or family seeking assistance and the steps taken to obtain third party evidence.

Self-Certification vs. Third Party Verification:

- ▶ 100% of households served can use self-certification for 3 of their 12 months;
- ▶ 75% of households served need to use 3rd party for 9 months of their 12 months; and
- ▶ 25% of households served can use self-certification as documentation for any and all months.
- ▶ All self-certifications must be accompanied by notes from the intake worker that demonstrate the provider has exercised due diligence to obtain a higher level of documentation.

Documentation of Breaks of Homelessness

- ▶ The documentation standards for priority follow the same Homeless Documentation Order of Priority (1-3) on slide 7, and are required to be included within the file documentation if the client has had 4 separate occasions (breaks) in the last three years (must total 12 months).
- ▶ Self-certifications are acceptable forms of documentation of all breaks.

Acceptable forms of third-party Documentation:

- ▶ 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 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, where they were located, and the day(s) of the encounter;
- ▶ A written observation by a community member that has observed where the individual or head of household was living or is currently living and the date/date range; and
- ▶ A written referral by another housing or service provider.

Pop Quiz!

A healthcare professional is working monthly with a client who reports they have been sleeping outside. The professional is aware that this person is experiencing homelessness, noticing their shopping cart outside filled with belongings during every visit and they have also recognized the client on the streets.

- ▶ Can the healthcare professional provide third-party verification for three months of homelessness if they saw the client the last three months (once a month) without seeing them in their actual camp site?

Yes or No?

YES!

- ▶ The healthcare professional can provide a written or oral statement detailing that to the best of their knowledge and based on their professional judgment, the individual or head of household had been residing in a place not meant for human habitation at the time of the office visit.
- ▶ The written or oral statement must include the dates in which the healthcare professional met with the individual or head of household and why they believe the person was residing in a place not meant for human habitation.

<https://www.hudexchange.info/faqs/2760/can-housing-or-service-providers-such-as-emergency-shelter-staff-members/>

Written 3rd Party Documentation...

Agency Letterhead

June 1, 2019

To Whom it May Concern,

This letter certifies that I witnessed Jane Doe sleeping in a place not meant for human habitation for the months of October, November, and December of 2018.

I am an outreach worker in homeless services and I encountered Jane sleeping in her tent on 10/25/18, 11/3/18, and 12/20/2018. Her tent was located just off 6th Street near the Redwood Gospel Mission in Santa Rosa, CA. I am verifying three months of Jane Doe's homeless history.

Thank you,



Michael Brown
Agency Name, Outreach Specialist (title)
Location of Office
Santa Rosa, CA
707-555-1234

Needs to Include:

- ▶ The role of the service provider;
- ▶ Where the client was/is homeless;
- ▶ Dated timeframe (including actual dates or months with the year, this is needed to create homeless history);
- ▶ Include workers name, title, agency, date and signature; and
- ▶ Included on an agency letterhead or a printed email.

Written 3rd Party Documentation...(cont.)

How can encounters with clients by outreach or intake worker be considered 3rd party documentation?

- ▶ **Current occasion:**

 - Outreach or intake worker must have physically observed where household is living.

- ▶ **Prior months & occasions:**

 - Can document past encounters with client that had been residing in a location.

 - If not in the actual place where client was residing, worker must state why they believe (based on their judgement) that the client was sleeping in one of the permitted locations.

- ▶ **One day of an encounter** can count for an entire month of documentation, as long as there is no other evidence of a break in homelessness.

 - E.g. If the client has an HMIS program history of staying in a transitional housing unit for 2 weeks during the same month, this cannot be counted as the entire month.

Self-Certification of Homelessness

If the client does not have 12 months homeless verified by a third party at project entry, they can fill out a [self-certification form](#) for all months missing upon intake. This form needs to be witnessed/signed by the intake worker.

- ▶ The intake worker will then have **180 days** to collect third party documentation for homeless history.
- ▶ Documentation of due diligence (or third party attempts) needs to be recorded within the clients file (including attempts during initial intake, and responses or lack of responses from the attempts).
- ▶ Only 9 out of 12 months have to be recorded using third party documentation.
- ▶ 25% of people in the project can have 100% self-certification of homelessness.
- ▶ Documentation of due diligence is required for all 12 months of 3rd party verification and needs to be recorded even if they have 9 months certified.

Self-Certification of Homelessness

- ▶ Breaks in homelessness can be 100% documented by self-certification.
 - ▶ Breaks **NEED** to be documented and included within the client homeless history verification packet.
 - ▶ Self-certification form has a space for staff to document due diligence to collect third party verification.
- ▶ Self-certification form available on the CoC website:
<https://sonomacounty.ca.gov/CDC/Homeless-Services/Continuum-of-Care/Compliance/>

Disability Verification Documentation...

- ▶ Documentation of a disability is acceptable in the following forms:
 - ▶ Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently
 - ▶ Written verification from the Social Security Administration
 - ▶ The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation)
 - ▶ Intake staff-recorded observation of disability that, **no later than 45 days** from the project start date, is confirmed and accompanied by evidence listed above
- ▶ Disability Verification Form can be located on the CoC website:
<https://sonomacounty.ca.gov/CDC/Homeless-Services/Continuum-of-Care/Compliance/>

Documentation Importance

- ▶ It is important to only refer individuals to the CoC's Permanent Supportive Housing projects that appear to meet Chronic Homeless or DedicatedPlus status.
- ▶ If agencies accept clients into the project and house them:
 - ▶ without third party disability verification, the agency only has 45 days to collect this documentation or they will be deemed ineligible for the project.
 - ▶ Do not have the required third party documentation within 180 days, the client would be deemed ineligible for the project.
- ▶ This would mean that the client would have to be exited from the housing program and the agency could be in a situation where they have to pay HUD back for the funding used during their stay.

Coordinated Entry

- ▶ Coordinated Entry staff will screen referrals for chronic homelessness eligibility prior to program referral.
- ▶ Coordinated Entry will collect some of the documentation required for program entry, but it is up to the provider to finalize the verification packet.
- ▶ The Coordinated Entry Operator has reporting access to pull client program history in HMIS. The Sonoma County HMIS is closed, therefore outside agencies will not have access to program history from another provider.
 - ▶ If you are a comprehensive access site that does PSH referrals, contact CE operator directly to access the clients HMIS program history reports.

Sonoma County CoC's Chronic Homeless and DedicatedPlus Forms

- ▶ A guide and forms have been developed to ensure providers can easily document and organize client homeless histories and disability verification as required with the CoC Program PSH eligibility.
- ▶ [Chronic Homeless Documentation Guide \(revised in 2021\)](#)
- ▶ Forms Developed:
 - ▶ [Chronic Homelessness Verification Packet](#)
 - ▶ [DedicatedPlus Verification Packet](#)
 - ▶ [Self-Certification of Homelessness Form](#)
 - ▶ [Disability Verification Form](#)
- ▶ All materials can be located at the CoC's website:
<https://sonomacounty.ca.gov/CDC/Homeless-Services/Continuum-of-Care/Compliance/>

Chronically Homeless & DedicatedPlus Verification Packets

- ▶ Used as a guide to help organize homeless history and client information.
- ▶ All third party documentation, self-certification forms, and disability verification form should be attached to the verification packet.
- ▶ After collecting basic client information, verifying disability, and collecting homeless history information/documentation, the provider filling out this packet must certify they believe this individual meets Chronic Homeless Status or DedicatedPlus depending on the PSH opening.
- ▶ The housing provider will then review the packet and collect additional information as needed to confirm client eligibility.
- ▶ If the applicant is deemed ineligible based on further review of materials with the timeline required, that individual will no longer qualify for the placement.
 - ▶ E.g. the provider was unable to obtain 3rd party disability verification within the 45 day timeline of entering the housing program.

Questions?

Providers Help Needed!

- ▶ If you are a provider in Sonoma County, we need your help to house the most vulnerable in our community!
- ▶ Collecting this documentation is a tedious process. If a CoC provider and/or Coordinated Entry staff member contacts you about homeless or disability verification, please respond in a timely fashion.
- ▶ If the documentation needed is not obtained, the agency could have to pay back HUD for the time the participant has been in the program and the participant will have to leave the program.
- ▶ Thank you for your support!

Questions?

Additional Resources:

- ▶ [HUD Exchange: Defining “Chronically Homeless” Final Rule Webinar](#)
- ▶ [HUD Exchange Chronic Homelessness Resources](#)
- ▶ <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/coc-and-esg-homeless-eligibility-overview/>

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