


THE NEW FINAL RULE  
DEFINING  
“CHRONICALLY  
HOMELESS”

# AGENDA

- PART 1 – BACKGROUND & CONTEXT
- PART 2 – CHRONICALLY HOMELESS FINAL RULE
- PART 3 – CHRONICALLY HOMELESS DEFINITION
- PART 4 – DOCUMENTATION REQUIREMENTS
- PART 5 – ELIGIBILITY DOCUMENTATION REFRESHER  
& FORMS
- Part 6 – TIPS & TRICKS
- PART 6 – QUESTIONS & KEY TAKEAWAYS



**PART 1**  
**BACKGROUND**  
**& CONTEXT**

# BIG NEWS!

- HUD amended the definition of “chronically homeless.”
- Under the new definition, a person must be homeless for a total of  $\geq 12$  months.
- This includes a person who has been homeless 4+ times in a 3-year period.
- HUD defines a “break” in homelessness as 7+ nights, to make it easier to document 12 months of homelessness.
- This applies to all project participants admitted on January 15, 2016 and after.
- It does not apply retroactively to current participants.

# REMEMBER WHY WE DO THIS!

- Documenting chronically homeless status may not be the most fun part of your job. But it is **so important!**
- When you take the time and effort to properly document your clients' status, you are:
  - ▣ Using your project's resources for the highest-need population,
  - ▣ Setting yourself up for success as a HUD recipient and high performer locally, AND
  - ▣ Helping HUD's nationwide data collection efforts.

# STATUTORY & REGULATORY CONTEXT

## □ Statutes

- **McKinney-Vento Homeless Assistance Act (1987)**
- **HEARTH Act (2009)**

## □ Regulations

- **“Homeless” Definition Final Rule (2011)**
- **CoC Program Interim Rule (July 2012)**
- **Rural Housing Stability Assistance Program Proposed Rule (March 2013)**



**PART 2**

**CHRONICALLY HOMELESS**

**FINAL RULE**

# INTRO TO THE FINAL RULE

- Applicable to 24 CFR Parts 91 and 578:
  - ▣ Consolidated Submissions for CPD Programs
  - ▣ The CoC Program
- Other HUD programs (plus USICH and the VA) tend to adopt HUD's definition of chronically homeless, but they are not required to do so.
- The final rule establishes two major sets of rules:
  - ▣ 1. The definition of “chronically homeless” to be used in homeless assistance programs.
  - ▣ 2. Corresponding recordkeeping requirements.



# TIMING OF THE FINAL RULE

## □ IMPORTANT DATES!

- Effective Date: January 4, 2016
- Compliance Date: **January 15, 2016**
- All CoC Program recipients must comply with the final rule defining “chronically homeless” for all program participants admitted after January 15, 2016.
- The rule **does not apply retroactively** to program participants admitted to a CoC Program prior to January 15, 2016.

# LEGAL & POLICY OBJECTIVES

- The new final regulatory definition meets two broad legal and policy objectives:
  - ▣ **Legal**: It complies with the McKinney-Vento definition.
  - ▣ **Policy**:
    - It “focuses on the persons with the longest histories of homelessness, who often also have the highest need,” to target them for PSH.
    - It provides more clarity and detail so that eligibility documentation and data collection is consistent nationwide.

# CLARIFICATIONS

## □ Cumulative 12 Months

- Chronically homeless persons must be homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for  $\geq 12$  months.
- For chronically homeless persons experiencing  $\geq 4$  occasions of homelessness over a period of 3 years, the cumulative total of the occasions must  $\geq 12$  months.

## □ Documenting a Break

- A break in homelessness = any period of 7+ consecutive nights.
- A stay in an institutional care facility for  $< 90$  days (where immediately prior to the stay, the person(s) were homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter) **does not constitute a break.**

# CLARIFICATIONS (CONT.)

## □ **Clear Recordkeeping Requirements**

### □ The new recordkeeping rules:

- Establish HUD's preferred order of documentation
- Provide clarity about documenting status
- Provide documentation standards for disability
- Attempt to balance the cost of fully documenting status with the benefit of targeting housing and services to the neediest

## □ **Additional Clarifications**

- The final rule includes “technical and minor clarifying changes” to the previous proposed rules.



**PART 3**

**CHRONICALLY HOMELESS**

**DEFINITION**

# THE FINAL RULE

- The Final Rule defines “chronically homeless” 24 CFR 91.5 and 24 CFR 578.3.
- It also amends 24 CFR 578.103, applicable to recordkeeping requirements of the CoC Program.
- We will focus on 24 CFR 578.3 and 578.103, given their applicability to the CoC Program.

# “CHRONICALLY HOMELESS” ¶ 1

- PARAGRAPH 1 – ***Chronically homeless*** means:
  - ▣ A homeless individual with a disability who:
    - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, AND
    - Has been homeless and living in such a place for at least 12 months OR on at least 4 separate occasions in the last 3 years, **as long as** the combined occasions:
      - $\geq 12$  months, AND
      - Each break in homelessness  $\geq 7+$  consecutive nights.

# INSTITUTIONAL CARE FACILITIES

- Stays in institutional care facilities for  $< 90$  days do not count as a break in homelessness.
- They count towards the 12-month total, as long as the individual was living in a place not meant for human habitation, etc., immediately before entering the institutional care facility.



# “CHRONICALLY HOMELESS” ¶ 2

- PARAGRAPH 2 – *Chronically homeless* also means:
  - ▣ An individual:
    - Who has been residing in an institutional care facility
    - For < 90 days, AND
    - Met all PARAGRAPH 1 criteria before entering that facility.

**Note:** An institutional care facility can be a jail, substance abuse or mental health treatment facility, hospital, or other similar facility.


# “CHRONICALLY HOMELESS” ¶ 3

- PARAGRAPH 3 – ***Chronically homeless*** also means:
  - ▣ 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 PARAGRAPH 1 or 2.

**Note:** This includes families whose composition has changed while the head of household has been homeless.

# PUTTING IT ALL TOGETHER

- ***Chronically homeless***, then, means:
  - A homeless individual/head of house with a disability who:
    - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, AND
    - Has been homeless and living in such a place for at least 12 months OR on at least 4 separate occasions in the last 3 years, **as long as** the combined occasions:
      - $\geq 12$  months, AND
      - Each break in homelessness = 7+ consecutive nights.
  - A homeless individual may be residing or have resided in an institutional care facility for  $< 90$  days AND met all above criteria before entering the facility.
  - Facility stays  $< 90$  days do not constitute a break in homelessness.



**PART 4**

**DOCUMENTATION**

**REQUIREMENTS**

# RECORDKEEPING REQUIREMENTS

- ***Chronically homeless status:***
  - Recipients must maintain written intake procedures to comply with the chronically homeless definition.
  - The procedures must require documentation at intake of the evidence relied upon to verify chronically homeless status, including disability.
  - The procedures must also establish the order of priority for obtaining evidence verifying status.

# ORDER OF PRIORITY

- The written intake procedures must establish the following order of priority for obtaining evidence:

1. Third-Party  
Documentation

2. Intake Worker  
Observations

3. Certifications from  
the homeless individual

# ORDER OF PRIORITY & HMIS

- HMIS (or comparable database) records count as third-party documentation and/or intake worker observations.
- **However**, the HMIS (or other database) must:
  - Retain an auditable history of all entries
    - **Example**: “Who, What, When,” AND
  - Prevent overrides or changes of the dates of entries.

# EVIDENCE REQUIREMENTS

Evidence that an individual is homeless with a disability (per § 401(9) of McKinney Vento) must include:

**1**

Evidence of homeless status

**2**

Evidence of a disability



# EVIDENCE OF HOMELESS STATUS

- **“Standard” evidence that the individual currently lives in a place not meant for human habitation, a safe haven, or in an emergency shelter:**
  - HMIS (or comparable database) record(s),
  - Written observation(s) by an outreach worker of the conditions where the individual was living,
  - A written referral by another housing or service provider, OR,
  - **Where this standard evidence cannot be obtained**, a certification by the individual seeking assistance.

# THE RULE ON SELF-CERTIFICATIONS

- Where better evidence cannot be obtained, a self-certification counts as evidence.
- **However**, if the intake worker relies on a self-certification as evidence, he or she must document:
  - ▣ The living situation of the individual or family seeking assistance, AND
  - ▣ All steps taken to obtain higher order-of-priority evidence.

# EVIDENCE OF HOMELESS STATUS

- **Evidence that the individual has been homeless for the cumulative 12-month total must include a combination of the standard:**
  - HMIS (or comparable database) record(s),
  - Written observation(s) by an outreach worker of the conditions where the individual was living,
  - A written referral by another provider, OR,
  - **Where this standard evidence cannot be obtained, a certification by the individual seeking assistance.**
- Certain conditions also apply!

# EVIDENCE SUBJECT TO CONDITIONS

- You have third-party documentation of an encounter with a provider on one day → You can consider the individual homeless for the **entire calendar month**.
- **Example**: May 5 → Counts for May 1 through May 31.
- **Exception**: The individual spent 7+ consecutive nights in a place meant for human habitation.
- **Example**: May 5, with a 7-day TH stay → **Does not** count for May 1 through May 31.

# EVIDENCE SUBJECT TO CONDITIONS

- Each break in homelessness of 7+ consecutive nights can be documented with the standard evidence.
  - ▣ But HUD also says that breaks in homelessness may be documented “entirely based on a self-report by the individual seeking assistance.”
  - ▣ It makes sense to focus more on documenting homelessness than documenting breaks, but be cautious about self-reports when you know third-party evidence exists and can be obtained.

# INSTITUTIONAL CARE FACILITIES

- If an individual resided in an institutional care facility for < 90 days and was chronically homeless before entering the facility, other evidence **in addition to** the standard must include:
  - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institutional care facility stating the start and end dates of the individual's stay, OR
  - **Where this standard evidence cannot be obtained:**
    - A written record of the intake worker's due diligence in attempting to obtain it, AND
    - A certification by the individual that he or she has exited the facility where he or she resided for < 90 days.

# EVIDENCE SUBJECT TO CONDITIONS

- For **at least 75%** of the chronically homeless individuals and families assisted during an operating year, **no more than 3 months** of living in a place not meant for human habitation, etc., may be documented using self-certification for each chronically homeless individual or family.
- **Exception:** This limitation does not apply to documentation of breaks in homelessness between separate occasions, which can be documented entirely based on self-certification.

# THE RULE ON FAMILIES

- If a family counts as chronically homeless under the chronically homeless definition, the documentation requirements apply to:
  - ▣ The adult head of household OR
  - ▣ If there is no adult in the family, a minor head of household.
- All required types of evidence must be obtained to document the adult or minor head of household's chronically homeless status, including disability.



# DISABILITY DEFINED

- An individual shall be considered to have a disability if he or she has a condition that:
  - ▣ Is expected to be long-continuing or of indefinite duration,
  - ▣ Substantially impedes the individual's ability to live independently,
  - ▣ Could be improved by the provision of more suitable housing conditions, AND
  - ▣ Is a physical, mental, or emotional impairment including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury.

# EVIDENCE OF A DISABILITY

- **Evidence of a disability includes:**
  - Written verification of the disability from a professional licensed by the state to diagnose and treat the disability, AND his/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 or Veteran Disability Compensation)
  - Intake staff-recorded observation of disability that, **no later than 45 days** from the application for assistance, is confirmed and accompanied by at least one other piece of evidence
  - Other documentation approved by HUD



**PART 5**

**ELIGIBILITY DOCUMENTATION**

**REFRESHER & FORMS**

# Category 1: Literally Homeless

## Documentation Requirements

- Each of the 3 subcategories has its own special documentation rules.
- Please keep in mind that persons can fit into any one of the 3 subcategories.
- Thus, client files for an individual or family that is literally homeless only need one of the following types of documentation.

# Subcategory A: Place Not Meant for Human Habitation

## Documentation Requirements

Subcategory A	You Need One (1) Document for the File
<p>An individual or family who has a primary nighttime residence that is a public or private place not meant for human habitation.</p>	<p><b><u>ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Written observation by an outreach worker of the conditions where the individual or family was living;</li><li>• Written referral by another housing or service provider; or,</li><li>• Certification by the individual or head of household seeking assistance.</li></ul>

# Subcategory B: Temporary Living Arrangements

## Documentation Requirements

Subcategory B	You Need One (1) Document for the File
<p>An individual or family who is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs).</p>	<p><b><u>ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Written observation by an outreach worker of the conditions where the individual or family was living;</li><li>• Written referral by another housing or service provider; or,</li><li>• Certification by the individual or head of household seeking assistance.</li></ul>

# Subcategory C: Institutions

## Documentation Requirements

Subcategory C	You Need Two (2) Documents for the File
<p>An individual or family who is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</p>	<p><b><u>ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Written observation by an outreach worker of the conditions where the individual or family was living;</li><li>• Written referral by another housing or service provider; <b>or</b>,</li><li>• Certification by the individual or head of household seeking assistance.</li></ul> <p><b><u>PLUS ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution stating the beginning and end dates of residency. All oral statements must be recorded by the intake worker; <b>or</b>,</li><li>• If evidence described above isn't obtainable, a written record of the intake worker's due diligence in attempting to obtain that evidence <b><u>PLUS</u></b> a certification by the individual seeking assistance that states (s)he is exiting or has just exited an institution where (s)he has resided for 90 days or less.</li></ul>

# Category 2: Imminent Risk of Homelessness

## Documentation Requirements

- Each of the 3 definition components of persons at imminent risk of homelessness has its own special documentation rules.
- Please keep in mind that each component must be separately documented.
- Thus, client files for an individual or family that is at imminent risk of homelessness need all of the following types of documentation.



# Component A: Residence Lost Within 14 Days

## Documentation Requirements

### Component A

Residence will be lost within 14 days of the date of application for homeless assistance.

### You Need One (1) Document for the File

**ONE** of the following:

- A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
- For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; **or**,
- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
  - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; **or**,
  - If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete.

# Component B: No Subsequent Residence

## Documentation Requirements

<b>Component B</b>	<b>You Need One (1) Document for the File</b>
No subsequent residence has been identified.	Certification by the individual or head of household that no subsequent residence has been identified.

# Component C: No Subsequent Residence

## Documentation Requirements

Component C	You Need One (1) Document for the File
<p>The individual or family lacks the resources or support networks needed to obtain other permanent housing</p>	<p>Certification or other written documentation that the individual or family lacks the resources and support networks to obtain other permanent housing.</p>

## Category 3: Homeless Under Other Federal Statutes

### **Documentation Requirements**

- Each of the 4 definition components of persons homeless under other Federal statutes has its own special documentation rules.
- Please keep in mind that each component must be separately documented.
- Thus, client files for an individual or family that is homeless under other Federal statutes need all of the following types of documentation.

# Component A: Defined as Homeless Under Other Federal Statute

## Documentation Requirements

Component A	You Need One (1) Document for the File
<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who are defined as homeless under the other listed federal statutes.</p>	<p>Certification of homeless status by the local private nonprofit organization or state or local government entity responsible for administering assistance under the specified federal statutes.</p> <p>Note: “Other federal statutes” include examples such as the Head Start Act, the Violence Against Women Act, and the Department of Education’s definition of homelessness.</p>

## Component B: No Lease, Ownership, or Occupancy Agreement in Past 60 Days

### Documentation Requirements

Component B	You Need One (1) Document for the File
<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application.</p>	<p><b><u>ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Referral by a housing or service provider;</li><li>• Written observation by an outreach worker; <b>or,</b></li><li>• Certification by the homeless individual or head of household seeking assistance.</li></ul>

# Component C: Persistent Housing Instability

## Documentation Requirements

Component C	You Need One (1) Document for the File
<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who have experienced persistent instability as measured by two moves or more during the preceding 60 days.</p>	<p>Certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including:</p> <ul style="list-style-type: none"><li>• Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; <b>or,</b></li><li>• Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain them. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address.</li></ul>

## Component D: Expectation of Continued Housing Instability

### Documentation Requirements

Component D	You Need One (1) Document for the File
<p>Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who can be expected to continue in such status for an extended period of time due to special needs or barriers.</p>	<p><b><u>ONE</u></b> of the following:</p> <ul style="list-style-type: none"><li>• Written diagnosis from a professional who is licensed by the state to diagnose and treat that condition;</li><li>• Intake staff-recorded observation of disability within 45 days of the date of application for homeless assistance that is confirmed by a professional who is licensed by the state to diagnose and treat that condition;</li><li>• Employment records;</li><li>• Department of Corrections records;</li><li>• Literacy or English-proficiency tests; <b>or,</b></li><li>• Other reasonable documentation of the specified condition.</li></ul>



## Category 4: Fleeing/Attempting to Flee Domestic Violence

### **Documentation Requirements**

- Generally, the person's oral statement plus one other document is all that is required for the client file.
- However, programs may want to consider documenting oral statements for recordkeeping purposes.

# Category 4: Fleeing/Attempting to Flee Domestic Violence

## Documentation Requirements

### Category 4

Any individual or family who is fleeing, or is attempting to flee, domestic violence, who has no other residence, **and** who lacks the resources or support networks to obtain other permanent housing.

### You Need Two (2) Document for the File

An oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified, and that they lack the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other housing.

**PLUS ONE** of the following:

- If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker; **or**,
- Otherwise, the oral statement must be documented by a certification by the individual or head of household that the statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

# Forms (Not Yet Approved by HUD)

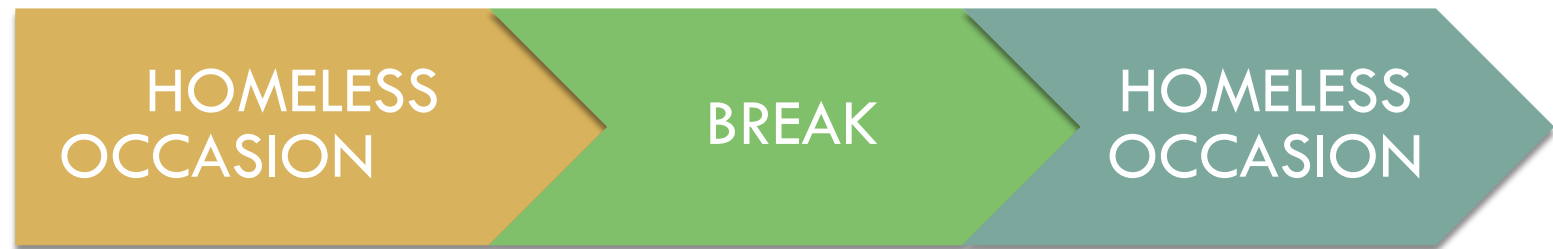
- 1. Documentation Checklist: Homelessness Verification
- 2. Homelessness Certification
- 3. Homelessness Self-Declaration Form
- 4. Verification of Chronic Homelessness Documentation Checklist and Self-Declaration of Housing Situation Timeline
- 5. Verification of Disability



**PART 6**  
**TIPS & TRICKS**

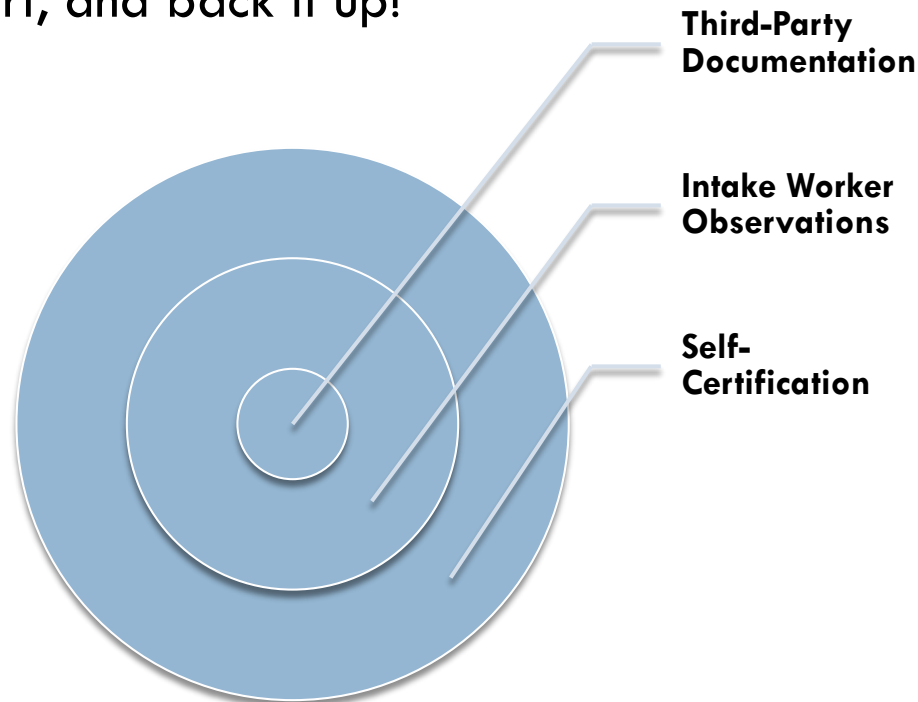
# TIMING IS EVERYTHING

- Document where the individual was living at all times, including occasions of homelessness and breaks.
  - ▣ Remember that breaks in homelessness may be documented entirely based on a self-report by the individual seeking assistance. Whew!
- The individual must be disabled **at the time** of project entry.



# BE DETAILED AND ORGANIZED

- Include as much detail as possible and keep case files user-friendly.
  - **Note:** Watch out for details that undercut your evidence! Document your efforts to resolve conflicting details that could undercut the evidence you're relying on.
- Remember HUD's stipulated order of priority! Rely on self-certification as a last resort, and back it up!





# PART 7

# QUESTIONS & KEY TAKEAWAYS

# HYPOTHETICAL #1

- Harry Potter presents at your PSH Project.
  - Exactly 18 months ago, he left his dormitory at Hogwarts for safety reasons when he became a political target. His friends Hermione and Ron accompanied him into the woods, where they camped every night for 18 consecutive months, engaging in a strategic campaign to find and destroy all of Voldemort's remaining horcruxes.
  - Harry suffered and continues to suffer from vivid nightmares and acute physical pain arising from a lightning-shaped scar on his forehead.
- **Is Harry chronically homeless?**
- **If so, how would you document his status?**



# HYPOTHETICAL #2

- Huck Finn presents at your PSH project.
  - ▣ Currently, he sleeps in a sidewalk tent, where he has been living for the past 10 months.
  - ▣ Before that, he spent 14 days couch-surfing with his friend Jim after exiting a substance abuse treatment facility, where he resided for 2 ½ months.
  - ▣ Prior to that, Huck lived in transitional housing for 6 months before receiving the referral for substance abuse treatment.
  - ▣ Before that, Huck stayed in an emergency shelter for 1 month, and prior to that, Huck lived on a raft with his friend Jim (who was homeless at the time, but is now stably housed) for 3 months.
- **Is Huck Finn chronically homeless? Why? Why not?**
- **If so, how would you document his status?**

# HYPOTHETICAL #3

- Fantastic Mr. Fox presents at your PSH project.
  - ▣ When Boggis, Bunce, and Bean brutally destroyed his home, he camped with his wife and four children underneath a tree for 6 months, coping badly with his trauma.
  - ▣ When Mr. Fox's symptoms worsened, Mrs. Fox moved with the children into transitional housing, and Mr. Fox checked into a mental health treatment facility for 2 months, where he was diagnosed with PTSD.
  - ▣ When Mr. Fox checked out, the family reunited, but they were unstably housed, sleeping in the fields near Boggis' henhouses for 4 months before presenting at your project.
- **Is Fantastic Mr. Fox chronically homeless? Why? Why not? What about the rest of the Fox family?**
- **If so, how would you document their status?**

# HYPOTHETICAL #4

- Bilbo Baggins entered your PSH project on January 31, 2016. His case file contains:
  - Oral statements made by outreach workers (recorded by your intake staff) which describe Bilbo's living situation on the streets of Rivendell for a period of 11 continuous months, from February 2015 to December 2015.
  - Intake staff's observations of disability, attached to a Social Security Disability check dated 30 days after Bilbo's entry.
  - An HMIS record that an outreach worker made contact with Bilbo in the Misty Mountains on January 15, 2016, when he was sleeping in the goblin tunnels.
- **Is Bilbo's documentation sufficient evidence of chronically homeless status? Why? Why not?**

# HYPOTHETICAL #5

- Scarlett O'Hara entered your PSH project on June 1, 2016. Her case file contains:
  - ▣ HMIS records that Scarlett stayed in an emergency shelter in Atlanta before living on the streets for a total of 10 months between March and December of 2015.
  - ▣ Evidence that Scarlett couch-surfed with Rhett Butler for 5 days.
  - ▣ Scarlett's own statement that for 2 months, from December 2015 to January 2016, she stayed at Tara, her family estate.
  - ▣ A written referral by a case worker stating that for 4 months, from February to May of 2016, Scarlett slept in the fields around her home after soldiers captured and looted it.
  - ▣ HUD-approved documentation that she suffers from PTSD.
- **Is Scarlett's documentation sufficient evidence of chronically homeless status? Why? Why not?**

# HYPOTHETICAL #6

- Jean Valjean entered your PSH project on November 22, 2016. His case file contains:
  - ▣ Jail records for 5 months, from June 21 to November 21.
  - ▣ Written verification from a prison counselor that Jean suffers from a disability.
  - ▣ Written observations by various case and outreach workers stating that immediately prior to his booking at the jail, Jean spent 7 continuous months sleeping in emergency shelters and otherwise living in the streets of Paris.
- **Is Jean's documentation sufficient evidence of chronically homeless status? Why? Why not?**

# KEY TAKEAWAYS

- ONE DAY = ONE CALENDAR MONTH
  - ▣ Except where the month includes a break
- BREAK = 7+ CONSECUTIVE NIGHTS
  - ▣ Not living in a place not meant for human habitation
- DOCUMENT BREAKS WITH SELF-REPORTS
  - ▣ Document occasions of homelessness with best evidence
- WHERE YOU CANNOT GET BEST EVIDENCE,
  - ▣ Document all attempts plus any oral statements, BUT ...
- ≤ 3 MO. CAN BE SELF-REPORTED FOR 75%+ CLIENTS
  - ▣ This applies to homeless occasions, not breaks
- RETAIN RECORDS FOR 5 YEARS FROM END OF GRANT

# IF YOU HAVE QUESTIONS ...

- Contact HomeBase! We love hearing from you.
  - Mary Kate: [marykate@homebaseccc.org](mailto:marykate@homebaseccc.org)
  - Nikka: [nikka@homebaseccc.org](mailto:nikka@homebaseccc.org)
- Visit HUD Exchange or Google “chronically homeless definition,” which will take you there:
  - [www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/](http://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/)
  - Submit questions via HUD Ask-A-Question (AAQ).

# UPCOMING TRAININGS

- Everything About Housing
  - February
- Landlord/Tenant Rights & Landlord Engagement
  - March
- Housing First
  - April
- Stay tuned!





**THANK YOU!**