

HUD's

HOMELESS ASSISTANCE PROGRAMS



Defining Chronic Homelessness: A Technical Guide for HUD Programs

September 2007

Office of Community Planning and Development
Office of Special Needs Assistance Programs



Acknowledgements

This guidance material was prepared by the Technical Assistance Collaborative under Contract NYPH-001-03 for the U.S. Department of Housing and Urban Development's Office of Community Planning and Development. This project was carried out in partnership with Policy Research Associates and the Corporation for Supportive Housing.

Cynthia High of the Office of Special Needs Assistance Programs for U.S. Department of Housing and Urban Development's Office of Community Planning and Development is acknowledged for providing the guidance necessary to produce this resource.

All materials in this work are in the public domain and may be reproduced or copied without permission from U.S. Department of Housing and Urban Development. Citation of the source is appreciated. However, this publication may not be reproduced or distributed for a fee without the specific written authorization of the Office of Special Needs Assistance Programs, Office of Community Planning and Development, U.S. Department of Housing and Urban Development.

Table of Contents

Introduction	1
Housing Programs for the Chronically Homeless	1
How to Use this Guide.....	1
Technical Guidance	3
Understanding the Chronic Homeless Definition.....	3
Qualifying Persons with Fluctuating Status.....	5
Understanding Special Circumstances.....	7
Collecting Necessary Documentation.....	8
Templates.....	11

Introduction

This technical guide is intended for non-profit local housing and service providers as well as local government agencies that are under contract with the U.S. Department of Housing and Urban Development (HUD) to provide housing and related support services to the target population of chronically homeless persons. It is intended to answer frequently asked questions pertaining to the federal definition of chronic homelessness and the standards for qualifying persons for housing under this definition. It also provides suggested templates for forms and letters that may assist providers, government agencies, and their local partners in devising internal mechanisms to certify homeless persons for a program for chronically homeless persons.

Housing Programs for the Chronically Homeless

Since 2003, HUD and other federal agencies joined together to fund four initiatives targeting chronically homeless persons. The first, known as the Collaborative Initiative to Help End Chronic Homelessness, was a \$35 million program for housing and support services that combined HUD's resources with funds from the federal Departments of Health and Human Services and Veterans Affairs. HUD went on from this initiative to award \$6.5 million in HOME funds to 13 communities for the purpose of creating permanent rental housing for chronically homeless persons.

A third initiative was a partnership, established between HUD and the Department of Labor, which selected five communities to receive funds to simultaneously address the employment issues and housing needs of chronically homeless persons. This program was followed by a fourth initiative known as Housing for People Who Are Homeless and Addicted to Alcohol. For this program, HUD committed \$10 million to a dozen pilot programs in 11 cities around the country to support projects designed for chronically homeless persons struggling with chronic alcoholism. In addition to these targeted initiatives, HUD also now actively encourages Continuum of Care communities to develop local strategies to end chronic homelessness. As a result, many new and existing McKinney-Vento permanent housing programs now target chronically homeless persons.

How to Use this Guide

This guide is intended to be of use to HUD McKinney-Vento grantees and sponsors, targeting chronically homeless persons, who are implementing housing and services for this population. Such grantees may also find it useful to share this guide with local homeless service providers who are asked to supply documentation verifying the eligibility of homeless persons. The templates included in this guide may also be useful to both grantees and their partners in the emergency shelter community. These templates may be adopted in the form presented here or modified to suit individual program needs. Note that these are not official HUD forms but, rather, suggestions for what information may be

useful to collect and for how the information may be organized to assist grantees in accurately assessing clients and reporting program results.

Technical Guidance

Understanding the Chronic Homeless Definition

1. *What is the Federal government's definition of a chronically homeless person?*

HUD adopted the Federal definition which defines a chronically homeless person as “either (1) an unaccompanied homeless individual with a disabling condition who has been continuously homeless for a year or more, OR (2) an unaccompanied individual with a disabling condition who has had at least four episodes of homelessness in the past three years.” This definition is adopted by HUD from a federal standard that was arrived upon through collective decision making by a team of federal agencies including HUD, the U.S. Department of Labor, the U.S. Department of Health and Human Services, the U.S. Department of Veterans Affairs, and the U.S. Interagency Council on Homelessness.

2. *What is meant by “homeless” in the definition of chronically homeless?*

In its definition of a chronically homeless person, HUD defines the term “homeless” as “a person sleeping in a place not meant for human habitation (e.g. living on the streets, for example) OR living in a homeless emergency shelter.”

3. *Does a homeless person who is applying to our program need to satisfy both of the time framed criteria, described above in question # 1, that define an individual as chronically homeless?*

No. The homeless person must meet only one or the other of the two time framed criteria that make up the definition.

4. *If a homeless person applying for assistance was housed in various settings between episodes of homelessness, could they qualify for assistance?*

Yes. An individual qualifying under the second criteria of the definition need not have moved between conventional housing and homelessness. Applicants may have spent time anywhere in between episodes of homelessness that could include medical settings, residential treatment programs, other kinds of institutions, transitional housing, supportive housing, and/or correctional institutions.

5. *If a homeless person who is applying to our program has had four episodes of homelessness, does it matter where they are when they seek our housing?*

Yes. As stated in question #2, the homeless person must be sleeping in a place not meant for human habitation (such as living on the street) or living in a homeless emergency shelter at the time of entry into the HUD housing for chronically

homeless persons. For example, a qualified homeless person might have the following type of history in the last three years: (1) leaves housing for a homeless shelter, (2) moves in with a friend or family member and leaves again for a homeless emergency shelter, (3) goes to jail and is released to living on the street, (4) goes back to the friend or family member's house and leaves to move into a homeless emergency shelter. Importantly, this homeless person will enter the HUD housing program for chronically homeless persons from a state of homelessness (i.e. in a homeless emergency shelter) as is required.

6. *What is meant by an “episode” of homelessness?*

An episode of homelessness is “a separate, distinct, and sustained stay on the streets and/or in a homeless emergency shelter.” HUD requires that “a chronically homeless person must be unaccompanied and disabled during each episode.”

7. *What is meant by an emergency shelter?*

An emergency shelter is “any facility the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless” (24 CFR Ch.V (4-1-05) 576.3). Although this definition includes the term transitional shelter, persons coming from transitional housing are not considered chronically homeless.

8. *What is meant by “disabling condition” in the chronically homeless definition?*

A disabling condition is defined as “a diagnosable substance abuse disorder, a serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of two or more of these conditions.” In addition, “a disabling condition limits an individual’s ability to work or perform one or more activities of daily living.” (*Questions and Answers: A Supplement to the 2006 Continuum of Care Homeless Assistance NOFA and Application: p.7*).

9. *Can homeless people who are applying to our program be accompanied by children and can couples qualify as chronically homeless?*

No. The homeless person must be an “unaccompanied homeless person” which means an individual such as “a single homeless person who is alone and is not part of a homeless family and not accompanied by children.”

Qualifying Persons with Fluctuating Status

- 1. Is it possible to direct certain homeless people, who have been qualified as chronically homeless, towards a short term stay in a facility providing substance abuse and/or psychiatric or medical treatment with the objective of stabilizing them and increasing the likelihood of their success in permanent housing?*

Yes. Under these or other similar circumstances, it is possible to direct qualified participants to short term treatment to precede housing placement. In general, HUD's chronically homeless initiatives and programs may not require that all clients participate in such interim treatment. However, on a case by case basis, if persons are identified who would benefit from this service, it may be recommended to them as a first step. Participants who decline such interim placement would still proceed directly towards identifying permanent housing. Participants who comply with the recommendation are considered enrolled in the program while in treatment which may not exceed 90 days. Upon completion of treatment, the participant should move directly into a permanent housing unit.

- 2. If a qualified chronically homeless person is referred to short term treatment, how do we reconcile HUD's requirement that new clients enter our program from a state of homelessness?*

A chronically homeless person, who chooses to start off participation in your program with a preliminary stay in short term treatment, would first be formally "entered" into the chronically homeless program prior to this placement. This participant would retain the status of having "entered" into the program while in interim treatment.

- 3. If a qualified chronically homeless person applying to our program enters short term treatment, to what extent should we engage in the housing search and placement process for such an individual?*

A participant who has been entered into your program and is temporarily in short term treatment should exit such a program directly into an identified housing unit to avoid the consequences of yet another episode of homelessness. Given this imperative, it may be necessary, in some cases, to hold a unit for a short period of time, not to exceed 90 days, to assure the participant's seamless transition from treatment to housing.

- 4. What if a homeless person who was chronically homeless for one full year and has the documentation to substantiate it, moved into a transitional housing program? Now that same person is applying for our program of permanent housing targeted to the chronically homeless. Does this person qualify?*

No. To be defined as chronically homeless, a person must be living on the street or in a homeless emergency shelter at the time of eligibility determination. The definition does not include those currently in transitional housing. Persons coming from transitional housing are not considered chronically homeless.

5. *What if an individual was qualified as chronically homeless and entered a different HUD-funded permanent housing program? Can that person hold onto that chronically homeless status and apply to our program?*

No. An individual who enters other HUD funded permanent housing, as with transitional housing, is no longer considered chronically homeless.

Understanding Special Circumstances

1. *Is it acceptable for a homeless person applying to our program to have been incarcerated in between episodes of homelessness?*

Yes. A homeless person who experienced incarceration or repeated incarcerations in between four episodes of homelessness over three years could be eligible provided that the person was living on the street or in a homeless emergency shelter at the time he/she is being evaluated for intake.

2. *Can we accept someone who is applying to enter our program directly from a correctional institution?*

No. Clients must be homeless, as per HUD's definition, at the time they enter the program.

3. *Can we accept someone who is applying to enter our program directly from a medical institution?*

No. Clients can not be in any kind of institution including medical facilities nor can they be in housing at the time they enter the program.

4. *What if a chronically homeless person was hospitalized and then released to a temporary placement in a motel for medical reasons which made placement in conventional shelter unsafe for the person? Could the stay in the motel constitute an episode of homelessness?*

If the medical institution could provide documentation that the motel was being used as a homeless emergency shelter for this person, this homeless person could be considered eligible if the other aspects of the homeless history were also documented.

5. *What if a homeless person applying for assistance is very nearly qualified but does not fit all aspects of the chronic homeless definition precisely such as someone who was on the streets for the last 11 months and was also homeless on and off for the last several years but not quite fitting either pattern in the definition of chronically homeless persons?*

Qualified homeless persons must meet HUD's definition of chronically homeless. However, persons who do not quite qualify at the outset of engagement with your program for reasons of time may, in fact, be determined eligible once the application process, which may take a period of weeks or more, is complete and the necessary time has elapsed. The documentation of eligibility must be completed before the homeless person enters the program.

Collecting Necessary Documentation

1. *What is required in the way of documentation of chronic homelessness?*

For each person applying to the program, written documentation must be provided by an appropriate Third Party that verifies the person's status as chronically homeless. This documentation must be kept in each participant's case record file. A recommended template for a Checklist for gathering and analyzing all necessary documentation associated with chronic homelessness is provided in this guide.

2. *What constitutes an appropriate Third Party for evidencing the chronic homeless status of persons applying to our program?*

Letters may be written and signed by either homeless shelter providers, homeless outreach workers, or other homeless service providers such as Health Care for the Homeless. Alternatively, a local Homeless Management Information System (HMIS) can be called upon to supply a printout of an individual's history in a local homeless service continuum. This printout may be substituted for a letter from a homeless provider.

3. *Would a letter from another kind of community-based human service agency suffice as evidence of chronic homelessness?*

In the absence of a homeless service provider who can account for an individual's history, letters may be supplied by other human service entities such as food pantries, social workers, outreach workers, health workers, law enforcement, hospitals, medical clinics, and churches.

4. *What must letters from appropriate Third Parties contain?*

Such Third Party letters and HMIS printouts must be on letterhead stationery and contain the full name of the client. Letters must include dates verifying the timeframe of homelessness including both a start date and completion date. Letters should also be signed by a staff member whose title appears on the letter. It is also helpful to request that such letters include information pertaining to the whereabouts of the person prior to engaging with this provider and, if applicable, after having left. When available, this additional information can be helpful in completing the record of the person's homelessness. A recommended template for the contents of a Third Party letter is provided in this guide.

5. *What if there is a gap in the Third Party documentation for which only the homeless person applying to our program can attest?*

In the absence of complete documentation from an appropriate Third Party and/or an HMIS printout, the homeless person may sign a Self-Statement, also known as a personal affidavit, attesting to his/her own whereabouts, history, and chronic homelessness status. Such a statement must have the same contents as Third Party

letters including dates, locations, a signature, and the full name of the homeless person. Those who can not write or compose their own letters may dictate them and provide their own mark or signature. These Self-Statements should also be signed by a staff member who witnessed the person create the document. A recommended template for the contents of a Self-Statement is provided in this guide.

6. *Is a Self-Statement in and of itself ever sufficient documentation?*

Generally, Self-Statements are to be used to fill in the gaps in the record of homelessness when certain periods of time can not be accounted for and documented by a Third Party. If all other efforts to obtain Third Party documentation have been exhausted and unsuccessful for a particular person, a Self-Statement may be used in the absence of any other documentation. However, this should be a relatively rare exception to the composition of most homelessness records for your program participants.

7. *What is the best strategy for obtaining documentation from a Third Party?*

Many homeless service providers are familiar with requests for letters documenting homelessness and may have their own internal form letter for such inquiries. However, homeless providers are relatively unfamiliar with the need to capture specific dates and the time frame of repeat visits to their program. Therefore, it is recommended that these parties be supplied a template letter to ensure the documentation is sufficient and consistent. Conducting outreach and training within a local homeless service network about chronic homeless documentation may also improve upon the readiness of providers to evidence the chronically homeless status.

8. *Can staff members of the organization that sponsors the housing for chronically homeless persons qualify persons themselves based on internal knowledge and information gathering?*

No. The supporting documentation must be provided by an appropriate Third Party. However, if a chronically homeless organization is also the provider of a homeless service, such as emergency shelter or street outreach, then an authorized staff person from the emergency component of the same organization can, in fact, be considered a Third Party and may provide and sign the letter.

9. *Is it acceptable to combine multiple letters and Self-Statements to complete documentation of chronic homelessness for one person?*

Yes. Expect that a record of chronic homelessness will be pieced together from several sources including Third Party Letters, HMIS printouts, and Self-Statements. Records with multiple sources are most likely to be needed when evidencing four episodes of homelessness in three years.

10. What if the shelter or homeless provider organization submits letters outlining the person's history that conflict with one another?

A homeless person's file should contain an accurate account of the person's history of homelessness. If Third Party Letters conflict with one another, one or more of these documents may need clarification. In such cases, a series of communications may be required with the parties who are providing the supporting documentation to clarify the history. Expectations of staff time needed to complete applications and eligibility assessments should reflect this common need for multiple phone calls, other communications, and corrections to documents.

11. What if a homeless person applying to our program has an accounting of their episodes of homelessness but can not supply certain pieces of information on where they resided intermittently between the four episodes?

A homeless person who can not provide complete information about their specific whereabouts, such as an address or the name of a homeless shelter, during certain parts of their homeless history can explain the lack of information in a Self-Statement. The Statement should present the reason for the lack of information, such as an illness, that impedes a homeless person's ability to remember the missing information.

12. What if a homeless person does not recollect the specific dates of episodes of homelessness in their history?

Homeless persons with conditions and diagnoses that impede their ability to recall certain dates related to their history can be assisted in reviewing the chronology of their experiences with homelessness and making best guesses at approximate time frames and specifics of locations that are their best recollection. The Self-Statements in their record should contain these specific dates and locations together with an explanation of the reason for the need to approximate this information.

13. What specific documentation is required to substantiate a homeless person's disability?

Written documentation to substantiate that a homeless person's disability meets the program definition must come from a qualified source such as a credentialed psychiatrist or other professional certified to make such a determination.

Templates

Chronically Homeless Qualification Checklist	Page 12
Chronically Homeless Third Party Verification Sheet	Page 13
Chronically Homeless Self-Statement Certification	Page 15
Chronically Homeless History Summary Sheet	Page 16

Chronically Homeless Qualification Checklist

Instructions: This suggested checklist may be used as a guide for staff of a program serving chronically homeless persons to assure that participants meet program regulation eligibility. It should be accompanied by supporting documentation of both disability and homelessness. Together, these documents must be maintained in the client's file.

Client Name: _____

HUD defines a Chronically Homeless person as: an unaccompanied homeless person (a single homeless person who is alone and is not part of a homeless family and not accompanied by children) with:

Part I. A Disabling Condition. *Check appropriate box(es):*

- A diagnosable substance abuse disorder
- A serious mental illness
- A developmental disability
- A chronic physical illness or disability, including the co-occurrence of two or more of these conditions.

Part I is supported by a letter from a medical professional attesting to the presence of the condition.

- Yes
- No

Part II. Chronically Homelessness Status. *Check ONE:*

- Has been continuously homeless for a year or more.
(HUD defines "homeless" as "a person sleeping in a place not meant for human habitation (e.g. living on the streets for example) OR living in a homeless emergency shelter.)
- Has had four (4) episodes of homelessness in the last three (3) years.
(HUD defines "homelessness" as "sleeping in a place not meant for human habitation (e.g. living on the streets for example OR living in a homeless emergency shelter.)

Part II is supported by Third Party Certification, which includes dates and locations of homelessness, from one or more of the following: *Check ALL that apply*

- Certification letter(s) from an emergency shelter for the homeless.
- Certification letter(s) from a homeless service provider or outreach worker.
- Certification letter(s) from any other health or human service provider.
- Certification Self-Statement signed by the client.

Staff Name: _____ Staff Title: _____

Organization: _____

Signature: _____ Date: _____

Chronically Homeless Third Party Verification – pg. 1

Instructions: This suggested template may be sent to homeless service providers requesting their verification of the chronically homeless status of an individual known to them. This template letter may be copied onto letterhead or recreated with the same content and printed on letterhead.

Date: _____

To:

Dear _____,

_____ has applied to receive the services of a McKinney-Vento funded program serving chronically homeless persons. To qualify, the homeless person must be determined to be chronically homeless as defined by the U.S. Department of Housing and Urban Development. Please complete this certification and fax it to my attention as soon as possible at the following **fax number:** (_____)_____.

This information will be used for the purpose of determining the chronic homeless status of the above-named homeless person. If you have any questions please do not hesitate to contact me at the following **telephone number:** (_____)_____.

Sincerely,

(Signature)

(Title)

I hereby authorize the release of the requested information.

(Signature of Client)

Chronically Homeless History Summary

Instructions: This Homelessness History Summary provides a suggested timeline to be used by grantees who receive funds for programs targeted to chronically homeless persons. It may be used to analyze whether or not the chronology of a homeless person's history meets the time frame for the definition of chronic homelessness.

Client: _____

Time Period		Whereabouts	Documented?
<i>Example: Jan. 1, 2005</i>	<i>Aug. 5, 2005</i>	<i>Lifeline Shelter, Cleveland</i>	Yes / No
			Yes / No

This summary indicates that the client: ____ is chronically homeless ____ is not chronically homeless.

Staff Name: _____ Staff Title: _____

Organization: _____ Date: _____