

December 7, 2015

## SNAPS In Focus: Final Rule on Defining "Chronically Homeless" Part II: Policy and Practical Implications of the New Definition

In <u>an earlier message</u>, Ann Oliva explained the background of how we got to the definition of chronically homeless included in the <u>final rule</u>. This message further describes the policy and HUD's intent as well as provides guidance around what to expect next.

First and foremost, HUD's intent is to prioritize households who have been homeless for very long periods of time and who may require more consistent engagement and assistance to exit homelessness. This will require communities to truly adopt a Housing First orientation and increase outreach and engagement efforts. It is not HUD's intent to make people wait longer to access needed housing, and HUD does not expect for a recipient of dedicated permanent supportive housing (PSH) to hold beds vacant while waiting for people to age into being chronically homeless. If no one in the Continuum of Care (CoC) meets the revised definition of chronically homeless, recipients can then serve other eligible households. HUD will be issuing updated guidance related to how non-chronically homeless households should be prioritized in light of the updated definition; however, until then, CoCs are encouraged to continue following the orders of priority established in Notice CPD-14-012 Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing.

It is possible that the definitional change will affect the number of people that meet the definition of chronically homeless. In some cases, it will mean that people previously considered chronically homeless will no longer meet the definition while others that had been excluded from this group—such as persons that cycle in and out of institutions—will now meet it. However, we want to be clear that this was not the goal of the change. The change in definition has been in development since 2012—long before we were nearing the deadline for reaching our goal. Our intent is simple—to ensure that communities around the country prioritize people for PSH with the most severe needs and the longest histories of homelessness, including those who have experienced homelessness for longer than the 10 years in which we've been working to end chronic homelessness. The current definition of chronically homeless allows for a person that has only been homeless for a handful of days over the last three years to be considered chronically homeless. Not only is this inconsistent with our values, it is also inconsistent when compared to the requirement under the same definition that someone would have to be homeless continuously for 12 months in order to be considered chronically homeless. PSH is a limited resource and we must ensure that those with the longest histories of homelessness and highest needs are prioritized. We believe this new definition—coupled with prioritization—will get us there.

In the efforts to end chronic homelessness, it will not be sufficient to simply demonstrate that there are no longer persons that meet the new definition. Communities will also need to build systematic capacity to ensure that no one becomes chronically homeless again in the future. Our hope is that once we meet the goal of ending chronic homelessness in this country, no one will ever again age into chronic homelessness and resources can be re-prioritized for other high-need populations. Over the next few weeks, we ask that you carefully review both the preamble and the regulatory text included in the final rule. In January, we will offer a webinar (on multiple dates) to ensure that everyone is able to hear the same information and have an opportunity to submit questions to HUD. We know that implementing this final definition will not be easy but we believe that it will put us on a path to truly end chronic homelessness once and for all.

Thank you for your commitment to ending homelessness!

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