



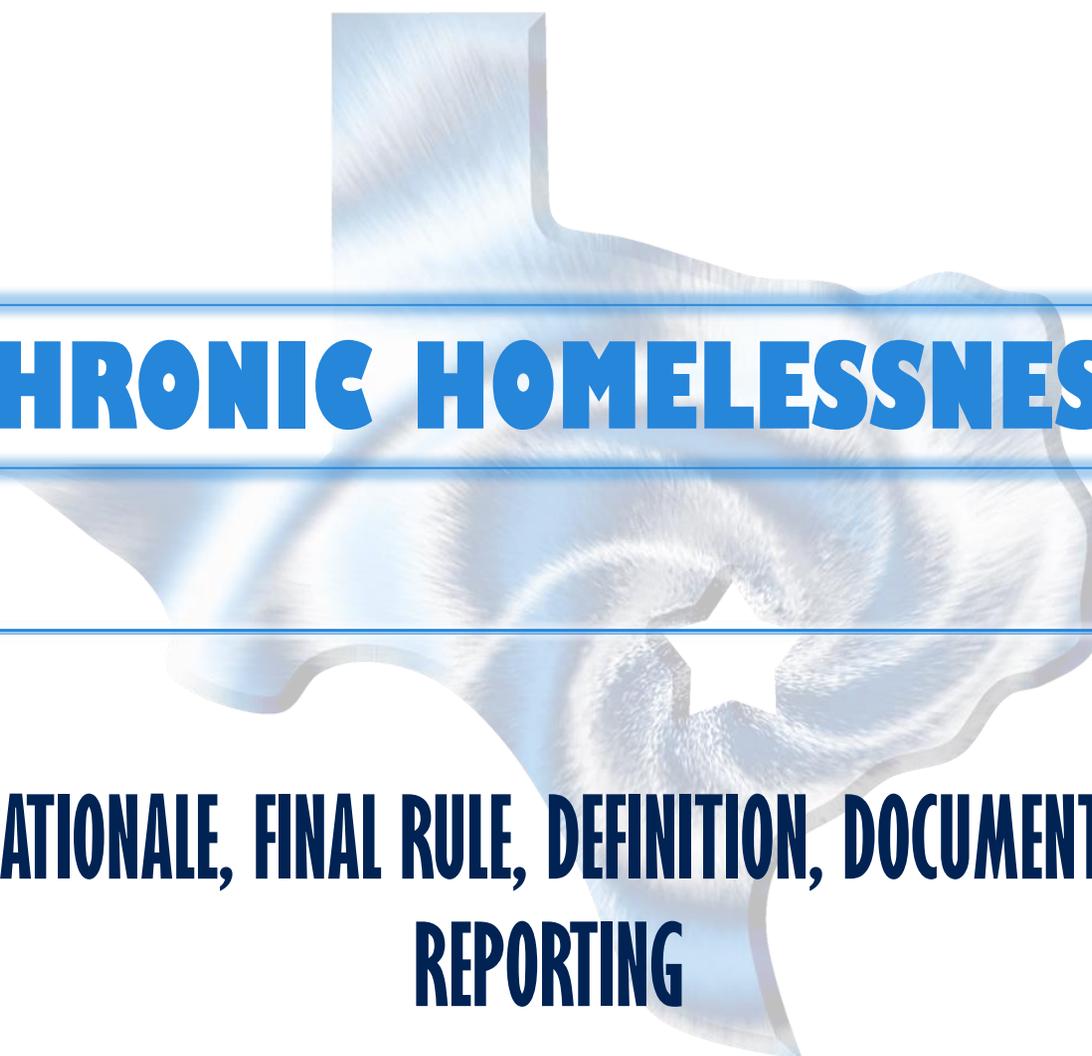
**BOWMAN SYSTEMS**



# **UNDERSTANDING CHRONIC HOMELESSNESS**

**HUD'S NEW DEFINITION**

**SP 5.12.X**



# **CHRONIC HOMELESSNESS**

**HISTORY, RATIONALE, FINAL RULE, DEFINITION, DOCUMENTATION AND  
REPORTING**



**BOWMAN SYSTEMS**

# HISTORY

- ▶ HUD first introduced the concept of Chronic Homelessness for Individuals in the FY 2002 CoC NOFA
  - ▶ Families were first included in the FY 2010 CoC NOFA
- ▶ In 2009 Chronic Homelessness was codified by the HEARTH Act
  - ▶ Went for public comment three times – in the ESG Interim Rule, CoC Interim Rule and the RHSAP proposed rule



# HISTORY

- ▶ The 2010 Opening Doors Federal Plan to End Homelessness set the strategy to end Chronic Homelessness by the end of 2015.
- ▶ This goal was adjusted to the end of 2017 as progress has been slower than expected and there was a delay in releasing the Chronic Homelessness Definition Final Rule
- ▶ Even after all the federal focus on Chronic Homelessness, overall only about 1/3 of PSH beds are CH Dedicated



# RATIONALE

- ▶ HUD has worked diligently to promote the prioritization of households (and individuals) who have been homeless for long periods of time
  - ▶ These households (and individuals) need more constant engagement and assistance to exit homelessness permanently
- ▶ HUD has encouraged communities to embrace Housing First (Prioritize the housing, then provide needed supportive services)
  - ▶ This is accomplished by increasing outreach and engagement



# RATIONALE

- Permanent Supportive Housing beds can either be Dedicated or Prioritized to serve Chronic Homeless
  - Prioritized beds are when the project agrees to prioritize CH clients over other PSH eligible clients
  - Dedicated beds (CoC funded projects only) are indicated as such in the Housing Inventory Count and in the Grant Agreement with HUD. They must serve CH Clients.
    - Despite the emphasis on prioritizing Chronically Homeless families and individuals, communities are not expected to hold CH dedicated beds vacant



# FINAL CHRONIC HOMELESS RULE

- ▶ HUD recognizes that changing the Chronically Homeless Definition may have an impact on a communities CH numbers.
  - ▶ Clients who were previously eligible as CH under the old rule may no longer be eligible.
  - ▶ Clients who were not eligible under the old rule may now be eligible
- ▶ The goal is to prioritize acceptance into PSH projects based on most severe needs and longest history of homelessness
  - ▶ This is because PSH is a limited resource



# FINAL CHRONIC HOMELESS RULE

- The Chronically Homeless Definition Final Rule went into effect on January 4, 2016
- Compliance for use of the new definition went into effect on January 15, 2016
  - If clients were placed into PSH projects for Chronically Homeless prior to January 15, 2016 there is no impact on their eligibility. They remain eligible under the old definition.
- The 2016 PIT count used the new Chronically Homeless Definition for counts



# FINAL CHRONIC HOMELESS RULE

- ▶ The Final Rule ensures consistency in two different ways
  - ▶ CoCs have a consistent way to determine Chronic Homelessness Status
  - ▶ HUD has a consistent method for counting Chronic Homelessness at either Project Entry or at a Point in Time.
- ▶ HUD uses and recommends that CoCs use the HMIS Reporting Glossary for calculations



# DEFINITION

## ➤ Chronically homeless means:

➤ (1) A “homeless individual with a disability,” as defined in the Act, who:

- lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
- Occasions separated by a break of at least seven nights
- Stays in institution of fewer than 90 days does not constitute a break



# DEFINITION

- ▶ Chronically homeless means:
  - ▶ (2) An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility;
  - ▶ or



# DEFINITION

- ▶ Chronically homeless means:
  - ▶ (3) 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 paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the **head of household** has been homeless.



# DEFINITION - NUANCES

- Four occasions must total 12 months
- Replaced “disabling condition” with “homeless individual with a disability”
- Occasion is defined by a break of at least seven nights not residing in an emergency shelter, safe haven, or residing in a place meant for human habitation
- Stays in institution of fewer than 90 days do not constitute a break and count toward total time homeless



# DOCUMENTATION

- Along with the new definition of Chronically Homeless HUD released new guidance on how to properly document chronic homelessness (outside of HMIS)
  - Specifically there is guidance on how to reflect the length of time homeless (12 or more months)
  - AND the standards for documenting the client's disability



# REPORTING: DATA ELEMENTS

<b>Continuously Homeless for at Least One Year</b>	<b>Adults/HoH</b>
<b>Number of Times Client Homeless in Past 3 Years</b>	<b>Adults/HoH</b>
<b>If 4 or More (for Above), Total Number of Months</b>	<b>Adults/HoH 4+ONLY</b>
<b>Total Number Months Cont Homeless Prior to Entry</b>	<b>Adults/HoH</b>
<b>Status Documented?</b>	<b>Adults/HoH</b>

<b>CLIENT ENTERING</b>	<b>HOH ONLY</b>
<b>Client Entering From Streets, ES, or SH</b>	<b>Adults/HoH</b>
<b>Approximate Date Started (if Yes for above)</b>	<b>Adults/HoH &amp; Entering=Y</b>
<b>Number of Times on Streets/ES/SH in Past 3 Years</b>	<b>Adults/HoH</b>
<b>Total Number of Months Homeless in Past 3 Years</b>	<b>Adults/HoH &amp; 1+Times</b>



# REPORTING

- ▶ **HMIS Data Standards fields referenced**
  - ▶ Project type (2.4)
  - ▶ Method for tracking emergency shelter utilization (2.5)
  - ▶ Project entry date (3.10)
  - ▶ Disabling condition (3.8)
  - ▶ Physical disability (4.5)
  - ▶ Developmental disability (4.6)
  - ▶ Chronic health condition (4.7)
  - ▶ HIV/AIDS (4.8)
  - ▶ Mental health problem (4.9)
  - ▶ Substance abuse (4.10)
  - ▶ Time on streets emergency shelter or safe haven (3.17)



# REPORTING

- ▶ A client's chronic homelessness status should be based on HMIS data elements
  - ▶ Each client has a chronic homelessness status at project entry using data from that entry.
  - ▶ Clients in street outreach, shelters, and safe havens may also have a "point-in-time" chronic homelessness status designed to include time spent from [project entry date] up to the point in time as time spent homeless.
  - ▶ Reporting on point-in-time chronic homelessness for other project types simply uses the client's CH status at project entry.



# REPORTING

- ▶ All household members on a particular project stay are also considered chronically homeless for that project stay if the head of household (who may be a child if in a child only household) or any adult in the household is chronically homeless.
- ▶ This applies to clients regardless of age, relationship to head of household, or any homeless history data specifically on these clients.
- ▶ When reporting on a particular date range, only the members of a household active in that date range can cause other household members to be considered chronically homeless.



# REPORTING AT ENTRY

**Disabling condition = yes**

**or**

**Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently = "Yes" for any of the following:**

**Physical Disability, Developmental Disability, Chronic health condition, HIV/AIDS, Mental health Problem, Substance Abuse**

**And**

**Client entering from the Streets, Emergency Shelter or Safe Haven = yes**

**or**

**Project type = Street Outreach, Emergency Shelter or Safe Haven**

**And**

**Approximate date started  $\leq$  project entry date - 365 days**

**or**

**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 = 4 or more times**

**AND**

**Total number of months homeless on the street, in ES, or SH in the past three years  $\geq$  12**



# REPORTING

- ▶ **Chronic Homelessness status at a point-in-time (CH-PIT)**
  - ▶ Clients in street outreach, shelters, and safe havens who may not have been considered chronically homeless at project entry may be considered CH later because of their additional time active in that project.
  - ▶ In order to include time spent in a project towards a client's total time spent homeless, it's first necessary to determine the number of months the client was homeless immediately prior to entry in the project:
    - ▶ Months homeless prior to entry = the number of months covered between Approximate Date Started and Project Entry Date
      - ▶ Use the “one day in a month counts the whole month” strategy when counting months.
      - ▶ In other words, any portion of a month covered by this date range causes the entire month to be included. Set Months Homeless Prior to Entry = 1 even if there is no data in Approximate Date Started



# REPORTING

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      - ▶ In other words, any portion of a month covered by this date range causes the entire month to be included. Set Months Homeless Prior to Entry = 1 even if there is no data in Approximate Date Started



# REPORTING AT POINT IN TIME

Disabling condition = yes

or

Expected to be of long-continued and indefinite duration and substantially impairs ability to live independently = "Yes" for any of the following:

Physical Disability, Developmental Disability, Chronic health condition, HIV/AIDS, Mental health Problem, Substance Abuse

And

Client entering from the Streets, Emergency Shelter or Safe Haven = yes

or

Project type = Street Outreach, Emergency Shelter or Safe Haven

And

Months Homeless Prior to Project Entry + Months in Project  $\geq$  12 Months

or

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 = 4 or more times

AND

Total number of months homeless on the street, in ES, or SH in the past three years + Months In Project  $\geq$  12



# AVAILABLE HUD RESOURCES

- ▶ Chronic Homelessness Webinar, Slides, Final Rule, Prioritization Notice and FAQs
  - ▶ <https://www.hudexchange.info/training-events/courses/defining-chronically-homeless-final-rule-webinar/>
- ▶ HMIS Glossary
  - ▶ <https://www.hudexchange.info/resource/4489/hmis-standard-reporting-terminology-glossary/>





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**ANY QUESTIONS?**

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