

CHRONICALLY HOMELESS FACT SHEET :: #2 Reporting

What kind of recordingkeeping is required?

- Recipients of CoC funds are required to maintain and follow a written intake procedure to ensure compliance with the new Chronically Homeless definition.
- DPHCD created a Chronically Homeless Certification form but agencies are still required to have their own written intake procedures.

What forms or evidence is required to document Chronic Homeless status?

- Once it has been determined that an individual or household may meet the definition of being chronically homeless and is residing in a place not meant for human habitation and/or a shelter/motel, programs must seek documentation to confirm. Agencies should work to acquire documentation in the following order:
 1. Third Party Documentation;
 2. Intake Worker Observation;
 3. Certification from the person seeking assistance.
- Ideally, all documentation would be obtained first through third-party documentation, then intake worker observations, and lastly through self-reporting if neither of the other sources is available.

What other requirements are there?

- Institutional Care – If an individual has resided in an institutional care facility for 90 days or less *and* was chronically homeless before entering the facility, all CoC programs must provide either discharge paperwork or a written record of due diligence in trying to get that discharge paperwork (phone logs, emails, etc.)
- Disability – Those individuals qualifying under the Chronic Homeless definition must also demonstrate evidence of a disability with certifications from a doctor *or* other similar professional licensed in MA.

Does a program have to document 12 months of homelessness (continuous vs cumulative)?

- As part of the new Chronically Homeless requirement, programs must document if an individual or family has been continuously homeless for 12 months or greater in three years or if they have a cumulative total of occasions/episodes—at least seven (7) days apart—that add up to 12 months or greater within that period.
- The new Chronically Homeless Certification form provides a series of check boxes that help guide intake staff through this process to ensure full documentation demonstrating the individual is continuously or cumulatively Chronically Homeless.

Does a program need to document the duration of someone's homelessness (continuous vs new occasions)?

- Yes! But when documenting someone's duration of homelessness, either one continuous period of homelessness or through a series of separate occasions, there are limitations on the extent a period can be documented solely through self-reporting.
- To document 12 months of continuous homelessness, only 3 months can be documented via self-reporting.
- At least 9 months of the 1-year period must be documented by one of the following:
 1. HMIS Data;
 2. Written Referral; or
 3. Written observation by an outreach worker
- Please note: HUD has not required that a single occasion of homelessness must total a certain number of days. Instead, HUD considers an occasion to be any period of homelessness where a household resides in a place not meant for human habitation, emergency shelter, or a safe haven.
- To document at least 4 distinct occasions of homelessness, at least 3 of the occasions must be documented in the same manner. Up to 3 months for continuous or one occasion may be documented through self-reporting.

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- In extremely rare circumstances, self-reporting may be accepted for the entire period when third-party evidence cannot be obtained. Intake staff *must* obtain a certification from the individual or head of household seeking assistance *and* document all efforts made to obtain third-party documentation. In addition, intake staff must also document the severity of the household's living situation.

What about existing clients that are already in the program prior to the new definition?

- Some people that were previously considered Chronically Homeless will no longer meet the definition while some that did not previously meet the definition will now meet it.
- Who is not impacted?
 - Program participants residing in permanent supportive housing (PSH) prior to January 15, 2016.
 - Program participants that have been accepted into PSH and are in process of locating a unit prior to January 15th.
- Who is impacted?
 - Program participants that are on a waiting list for PSH but have not yet been offered or accepted housing.
 - Programs participants who were admitted after January 15, 2016 in your program for dedicated or prioritized chronic beds/units must also meet the new definition UNLESS:
 - You document that there were no CH persons (within a specified subpopulation if applicable to your program) within the New Bedford CoC exist at the time in which your vacancy is available; and
 - You ensure and document that this is not an ongoing exception; that upon turnover, the bed/unit is again being used to serve chronically homeless persons unless there are none in the New Bedford CoC area; and
 - You document due diligence to locate and engage chronically homeless persons including, but not limited to, your interactions with THE CALL, etc.