

# Your Role in Documenting Homeless History

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# Presenter Information

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# Webinar Logistics

- Participants are muted
- Enter your questions in the box in your webinar panel
- Handouts are available with this webinar
- Forgot to ask a question or want to ask privately? Email me at [plancher@flhousing.org](mailto:plancher@flhousing.org)
- This webinar is being recorded and will be available at [www.flhousing.org](http://www.flhousing.org)
- A survey will immediately follow the webinar; **please** complete it! Thanks!

# Agenda



RECORDKEEPING &  
REPORTING  
REQUIREMENTS



USING HMIS TO  
DOCUMENT  
HOMELESS HISTORY



OBTAINING THIRD  
PARTY  
VERIFICATIONS



WHAT YOU CAN DO

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# Recordkeeping & Reporting Requirements

## 24 CFR § 578.103 - Recordkeeping requirements.

[CFR](#)

[Table of Popular Names](#)

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### § 578.103 Recordkeeping requirements.

(a) **In general.** The [recipient](#) and its [subrecipients](#) must establish and maintain standard operating procedures for ensuring that Continuum of Care program funds are used in accordance with the requirements of this part and must establish and maintain sufficient records to enable HUD to determine whether the [recipient](#) and its [subrecipients](#) are meeting the requirements of this part, including:

(1) **Continuum of Care records.** Each [collaborative applicant](#) must keep the following documentation related to establishing and operating a Continuum of Care:

- (i) Evidence that the Board selected by the Continuum of Care meets the requirements of [§ 578.5\(b\)](#);
- (ii) Evidence that the Continuum has been established and operated as set forth in [subpart B](#) of this part, including published agendas and meeting minutes, an approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least once every 5 years, evidence required for designating a single [HMIS](#) for the Continuum, and monitoring reports of [recipients](#) and sub [recipients](#);
- (iii) Evidence that the Continuum has prepared the application for funds as set forth in [§ 578.9](#), including the designation of the [eligible applicant](#) to be the [collaborative applicant](#).

(2) **Unified funding agency records.** UFAs that requested grant amendments from HUD, as set forth in [§ 578.105](#), must keep evidence that the grant amendment was approved by the Continuum. This evidence may include minutes of meetings at which the grant amendment was discussed and approved.

(3) **Homeless status.** Acceptable evidence of the [homeless](#) as status is set forth in [24 CFR 578.500\(b\)](#).

(4) **Chronically homeless status.** The [recipient](#) must maintain and follow written intake procedures to ensure compliance with the [chronically homeless](#) definition in [§ 578.3](#). The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. Records contained in an [HMIS](#), or comparable database used by victim service or legal service providers, are acceptable evidence of third-party documentation and intake worker observations if the [HMIS](#), or comparable database, retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made, and if the [HMIS](#) prevents overrides or changes of the dates on which entries are made.

(i) For paragraph (1) of the "Chronically homeless" definition in [§ 578.3](#), evidence that the individual is a "homeless individual with a disability" as defined in section 401(9) of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11360\(9\)\)](#) must include:

(A) Evidence of [homeless](#) status as set forth in [paragraph \(a\)\(3\)](#) of this section; and

(B) Evidence of a disability. In addition to the documentation required under [paragraph \(a\)\(4\)\(i\)\(A\)](#) of this section, the procedures must require documentation at intake of the evidence relied upon to establish and verify the disability of the person applying for [homeless](#) assistance. The [recipient](#) must keep these records for 5 years after the end of the grant term. Acceptable evidence of the disability includes:

(1) Written verification of the disability from a professional licensed by the [state](#) to diagnose and treat the disability and his or 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;

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# Category 1: Definition

- Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - Has a primary nighttime residence that is a public or private place not meant for human habitation;
  - Is living in a publicly or privately operated shelter designated to provide temporary living arrangements; or
  - Is exiting an institution where (s)he has resided for 90 days or less and who resided in an ES or place not meant for human habitation immediately before entering that institution

## Category 1: Recordkeeping Requirements

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;



- For individuals exiting an institution-  
one of the forms of evidence above  
and:
  - Discharge paperwork or  
written/oral referral, or
  - Written record of the intake  
worker's due diligence to obtain  
above evidence and certification  
by individual that they exited  
institution

## Category 1: Recordkeeping Requirements

# Category 4: Definition

- Any individual or family who:
  - Is fleeing, or is attempting to flee domestic violence (dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence);
  - Has no other residence
  - Lacks the resources or support networks to obtain other permanent housing

## Category 4: Recordkeeping Requirements

### **For victim service providers:**

- An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources.
- Statement must be documented by a self-certification or a certification by the intake worker.

## For non-victim service providers:

- Oral statement by the individual or head of household seeking assistance that they are fleeing
  - Documented by a self-certification or by the caseworker
  - Where the safety of the individual or family is not jeopardized, the oral statement must be verified; *and*

## Category 4: Recordkeeping Requirements


## For non-victim service providers continued:

- Certification by individual or head of household that no subsequent residence has been identified; *and*
- Self-certification, or other written documentation that the individual or family lacks the financial resources and support networks to obtain permanent housing.

## Category 4: Recordkeeping Requirements



## Homeless Definition

<b>RECORDKEEPING REQUIREMENTS</b>  	<b>Category 1</b>	Literally Homeless	<ul style="list-style-type: none"> <li>Written observation by the outreach worker; <u>and</u></li> <li>Written referral by another housing or service provider; <u>and</u></li> <li>Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</li> <li>For individuals exiting an institution—one of the forms of evidence above <u>and</u>:               <ul style="list-style-type: none"> <li>discharge paperwork <u>and</u> written/oral referral; <u>and</u></li> <li>written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution</li> </ul> </li> </ul>
	<b>Category 2</b>	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>A court order resulting from an eviction action notifying the individual or family that they must leave; <u>and</u></li> <li>For individual and families leaving a hotel or motel—evidence that they lack the financial resources to stay; <u>and</u></li> <li>A documented and verified oral statement; <u>and</u></li> <li>Certification that no subsequent residence has been identified; <u>and</u></li> <li>Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	<ul style="list-style-type: none"> <li>Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u></li> <li>Certification of no PIT in last 60 days; <u>and</u></li> <li>Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u></li> <li>Documentation of special needs; <u>and</u> 2 or more barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> <li>For victim service providers:               <ul style="list-style-type: none"> <li>An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.</li> </ul> </li> <li>For non-victim service providers:               <ul style="list-style-type: none"> <li>Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u></li> <li>Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>



## Homeless Definition

<b>CRITERIA FOR DEFINING HOMELESS</b>	<b>Category 1</b>	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregative shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>and</u></li> <li>(iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution</li> </ul>
	<b>Category 2</b>	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <u>and</u></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
	<b>Category 3</b>	Homeless under other Federal statutes	<p>(3) 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:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers</li> </ul>
	<b>Category 4</b>	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>

# Handout



# Policies & Procedures

- Written procedures must establish the order of priority for documenting homeless history and should be collected in this order:
  - First
    - 3<sup>rd</sup> party verification
  - Second
    - Intake worker observations
  - Third
    - Self-disclosure/Certification from the person receiving assistance





# Using HMIS to Document Homeless History

# What HMIS Data Tells Us

- Participation in CoC-funded housing programs
- Shelter stays
- Homeless and housing-related services
- Homeless history
- Self-disclosed disability
- Family composition

# What HMIS Might Not Tell Us

- Histories outside of your CoC/HMIS database
- Services provided by non-CoC funded providers who do not use HMIS.
- Service histories related to that person's disability
  - Severity of service need
  - Accommodations the person may require
- Interaction with other service systems
  - Child Welfare
  - Law Enforcement
  - Hospitals

## 3 Concepts: Using HMIS to Determine Chronic Homeless Status

1

Enrolling (entry/exits) in projects within HMIS, as it is related to projects that require chronic homelessness as part of eligibility.

2

Recording self-reported information about a person's living situation that helps calculate their chronic homeless status.

3

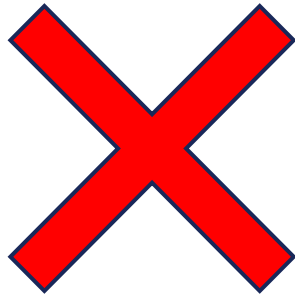
Recording self-reported disability status.

HMIS enrollment into projects that serve people who are literally homeless does not require additional verification because it is considered third party verification.

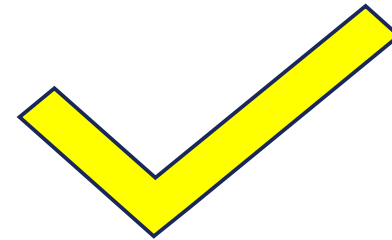


# What is Enrollment?

**Record of A  
Consumer's 211 Call**



**Receiving services  
from a street  
outreach worker**



Entry/Exit data recorded in HMIS is different than a self-reported response that is documented about their homeless history.

# HMIS

Entry/Exit can be used as 3<sup>rd</sup> Party Verification

One night in ES, SH, or Outreach contact serves as documentation for the entire month

Review HMIS history together with participant to build an accurate homeless history





Gap in documentation does not mean there is a gap in homeless history



## Chronic Homelessness Definition

This tool provides some sample recordkeeping tools for the Chronic Homelessness Definition. To review the exact language, please refer to 24 CFR Parts 91 & 578 and the [HUD Exchange](#).

### Recordkeeping Documentation Options Explained

<b>3<sup>rd</sup> Party Documentation</b>	<div data-bbox="643 325 894 611"></div> <p>Documentation from HMIS/Comparable Database</p> <p><i>Records must show entries/exits at Shelters.</i></p> <p><i>An answer of "Yes" to the question as to whether the individual is chronically homeless (Universal Data Element 3.917) is not sufficient.</i></p> <div data-bbox="894 325 1107 611"></div> <p>Written observation by an outreach worker or Written referral by another housing or service provider</p> <div data-bbox="1107 325 1331 611"></div> <p>Documentation from Institutions like Hospitals, Correctional Facilities, etc.</p> <p><i>Must include records about stay the length of stay, signed by Clinician or other appropriate staff.</i></p>
<b>Self Certification</b>	<div data-bbox="643 925 817 1146"></div> <p>Signed certification by the individual seeking assistance describing how they meet the definition, which must be accompanied by the intake worker's documentation of the living situation and the steps taken to obtain evidence to support it.</p> <p>Remember that for each Project:</p> <ul style="list-style-type: none"><li>• 100% of households served can use self-certification for 3 months of their 12 months,</li><li>• 75% of households served need to use 3<sup>rd</sup> Party documentation for 9 months of their 12 months, and</li><li>• 25% of households served can use self-certification as documentation for any and all months.</li></ul>

When do you need third party documentation?



# Documenting 3<sup>rd</sup> Party Verifications of Homelessness

## Using Outreach/Intake Encounters as 3<sup>rd</sup> Party Documentation

- Contacts in a street outreach project, emergency shelter, and safe haven should be used as third-party evidence for documenting chronic homeless status.
- Enrollment record is proof that the client was served in that project.

# Documenting the Encounters by Intake/Outreach

## Current:

- Must have a physical observation of where the household is coming from.

## Prior Months/Occasions:

- Ability to document encounters, having physically observed where they were living
- When unable to physically observe, must state why they believe the person was sleeping in a place not meant for human habitation (using their own judgement)
- Must report each month in which the worker saw the person served





# Thinking Outside of the Box

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Long-term homeless history,  
but not on your by-name  
list?



# 3<sup>rd</sup> Party Documentation from Alternative Sources

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TEACHERS



HEALTHCARE  
PROFESSIONAL  
(FQHCS)



LAW  
ENFORCEMENT



SUPPORTIVE  
SERVICES

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# Alternative Source Documentation

- Engagement with client on more than one occasion (in their official professional role)
- Client reported living situation to the professional
- Must detail specific months in written or oral statement confirming homelessness



- Discharging within 90 days or less
  - Literally Homeless prior to admission
- Discharge paperwork must detail beginning and end dates in the institution
- Provided by an appropriate official of that institution
  - Written or oral account to the intake worker

## Exiting an Institutional Setting

# Self- Reported Disability

Obtain a ROI to contact their service provider, if they have one.

- Substance Use
- Mental Health
- Physical
- Developmental

# Service Providers

- Do the client notes detail living situation or residential history?
- Can the case manager write a letter documenting homeless episodes?
- Has the service agency issued any homeless-specific funding on behalf of this consumer?
- Does the provider know where this consumer stays, camps, gets meals, etc?

# Law Enforcement



## LE's documented address of person

"At-Large"  
"Homeless"  
"Indigent"  
"General Delivery"



## Arrest history

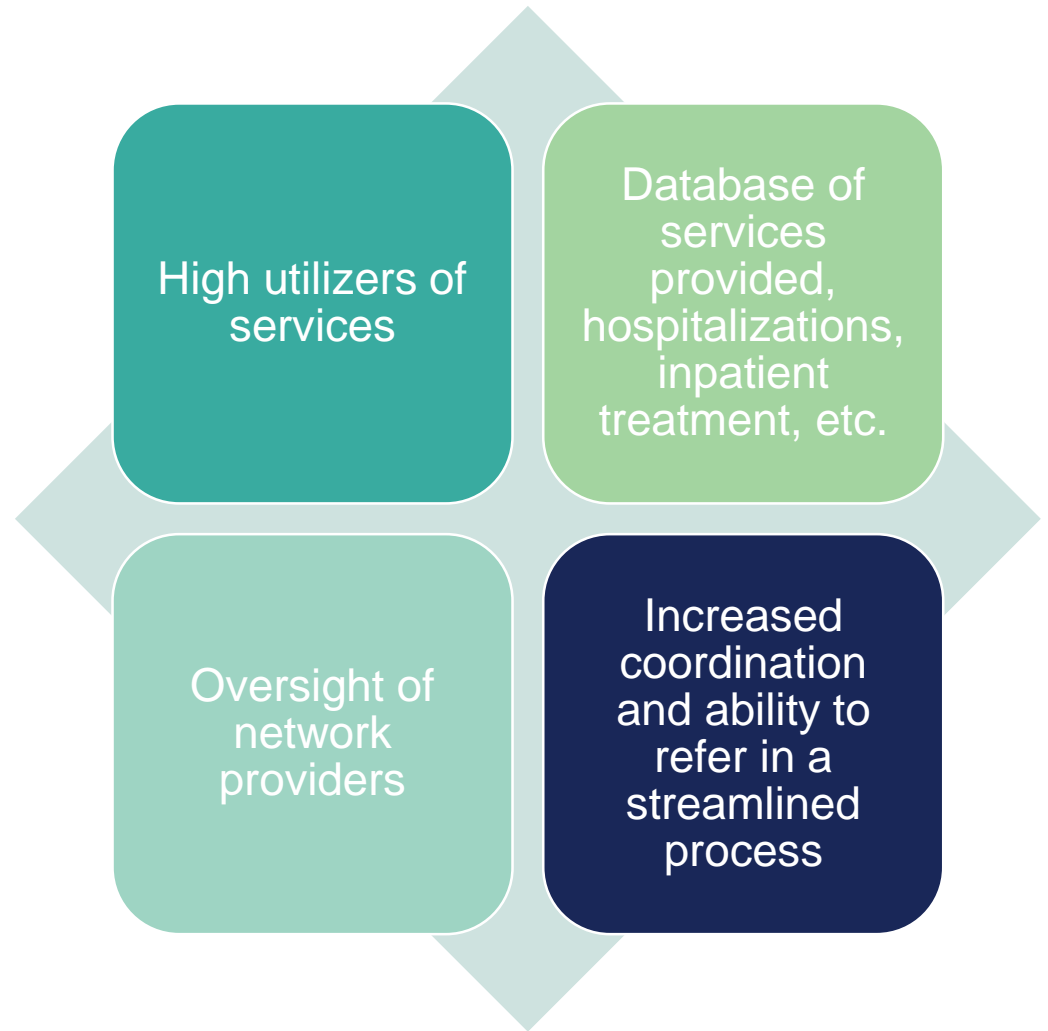


## History of interaction with LE

Can be documented in a letter from LE detailing dates of documented homelessness based on interactions



# Managing Entities



- Can offer an oral or written observation detailing a physical observation of where the applicant is or has been residing
- Must detail the exact months of the observation

Example: The person you are working with has been sleeping behind the gas station for two years.

## Community Members

# Homeless episodes out of CoC jurisdiction

- Find the CoC Lead Agency that serves the city the person reported to be residing in
- Contact CoC requesting homeless history that is documented in their HMIS database
- Fax/Email a ROI, requesting verification of homeless history
- Scan the documentation into your HMIS database



What Can  
You Do?

# Other Resources



HOSPITALS



COMMUNITY-  
BASED SERVICE  
PROVIDERS



MEAL SITES



CHURCHES &  
SYNAGOGUES



LIBRARIES



PARK &  
RECREATION  
STAFF

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## Document the Last 3 Years of Homeless History

- Sign and date it
- Scan it into HMIS
- Continue adding new information to build history

2019	Confirmation	2018	Confirmation	2017	Confirmation
January	Shelter	January	ME	January	
February	Shelter	February	ME	February	
March	Shelter	March	Outreach	March	
April	Outreach	April	Outreach	April	Outreach
May		May	Outreach	May	Case Manager
June		June		June	Case Manager
July		July		July	ME
August		August	Case Manager	August	
September		September	Case Manager	September	
October		October	Police	October	Case Manager
November		November	Jail	November	Outreach
December		December	Jail/Outreach	December	Outreach

# Creating a Paper Trail

- Fill in the gaps
- Scan letters into HMIS from non-CoC agencies documenting homelessness
- Make notes in HMIS detailing contact information of important providers outside of the homeless system and other important pieces of information



# Creating a Paper Trail Continued

- Identify where they've lived outside of your CoC and gather documentation of homelessness from those areas
- Obtain ROIs
- Advocate directly to the CoC if you think someone is chronically homeless, but is not on the by-name list

# Take The Time To...

- Update the service provider contact information in HMIS
- Sit with the person served to review and gather information about the person's homeless history.
  - Let them tell the story
  - Document it in HMIS for the next service provider



# Resources

- <https://www.law.cornell.edu/cfr/text/24/578.103>
- <https://www.law.cornell.edu/cfr/text/24/578.3>
- <https://www.law.cornell.edu/cfr/text/24/576.500>
- <https://www.hudexchange.info/resource/1974/criteria-and-recordkeeping-requirements-for-definition-of-homeless/>



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# Join Us For Our Next Webinar Next Tuesday, June 11<sup>th</sup> at 2pm

**Innovative Approaches to Addressing  
Homelessness: What's successful in other  
communities, and in Florida**

<https://www.flhousing.org/event/webinar-innovative-approaches-to-addressing-homelessness-whats-successful-in-other-communities-and-in-florida/>



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# Take the Survey



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