Your Role in Documenting Homeless History
The Florida Housing Coalition, Inc., is a nonprofit, statewide membership organization whose mission is to bring together housing advocates and resources so that all Floridians have a quality affordable home and suitable living environment.

WE’RE PROUD TO OFFER PROFESSIONAL CONSULTING SERVICES

In the areas of affordable housing, fair housing, ending homelessness, & related issues
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Florida Housing Coalition
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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
- This webinar is being recorded and will be available at 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
24 CFR § 578.103 - Recordkeeping requirements.

§ 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.

(b) 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.

(c) Homeless status. Acceptable evidence of the homeless as status is set forth in 24 CFR § 576.500(b).

(d) 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 procedures that must provide documentation at intake of the evidence relied upon to establish and verify chronically homeless status. The procedures must also establish the order of priority for procedures that must provide 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-lasting or of indefinite duration and substantially impairs the individual’s ability to live independently.
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
For non-victim service providers continued:

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

#### RECORD KEEPING REQUIREMENTS

<table>
<thead>
<tr>
<th>Category</th>
<th>Literally Homeless</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>Written observation by the outreach worker;</td>
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<td></td>
<td>Written referral by another housing or service provider;</td>
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<td></td>
<td>Certification by the individual or head of household receiving assistance verifying that the individual was living on the street or in shelter;</td>
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<tr>
<td></td>
<td>For individuals exiting an institution—one or the terms of residence above—evidence that they lack the financial resources to stay;</td>
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<tr>
<td></td>
<td>A documented and verified oral statement; and</td>
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<tr>
<td></td>
<td>Certification that no subsequent residence has been identified.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Category</th>
<th>Imminent Risk of Homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>A court order resulting from an eviction action notifying the individual or family that they must leave;</td>
</tr>
<tr>
<td></td>
<td>For individuals and families finding a heroin or meth—evidence that they lack the financial resources to stay;</td>
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<tr>
<td></td>
<td>A documented and verified oral statement; and</td>
</tr>
<tr>
<td></td>
<td>Certification that no subsequent residence has been identified.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Category</th>
<th>Homeless under other federal statutes</th>
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<tbody>
<tr>
<td>3</td>
<td>Certification by the non-profit or local government that the individual or head of household seeking assistance met the criteria for homelessness under another federal statute;</td>
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<td>Certification of no prior less than 60 days; and</td>
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<td></td>
<td>Certification by the individual or head of household and any available supporting documentation that the individual has moved two or more times in the past 60 days; and</td>
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<td></td>
<td>Documentation of special needs of two or more barriers.</td>
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<thead>
<tr>
<th>Category</th>
<th>Feeding/ Attempting to Fix Div</th>
</tr>
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<tbody>
<tr>
<td>4</td>
<td>For written service providers:</td>
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<tr>
<td></td>
<td>- An oral statement by the individual or head of household seeking assistance who states they are feeding, they have no subsequent residence, and they lack resources. Statement must be documented by self-certification or verification by the outreach worker;</td>
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<tr>
<td></td>
<td>- For non-written service providers:</td>
</tr>
<tr>
<td></td>
<td>- Oral statement by the individual or head of household seeking assistance who states they are feeding. Statement is documented by self-certification or verification by the outreach worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified;</td>
</tr>
<tr>
<td></td>
<td>- Certification by the individual or head of household that no subsequent residence has been identified;</td>
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<tr>
<td></td>
<td>- Self-certification, or other written documentation that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</td>
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### Criteria for Defining Homeless

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<tr>
<th>Category</th>
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<tr>
<td>1</td>
<td>(i) Individual or family who lacks a fixed, regular, and adequate nighttime residence, defined as:</td>
</tr>
<tr>
<td></td>
<td>(a) Has a primary nighttime residence that is a public or private place not meant for human habitation;</td>
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<tr>
<td></td>
<td>(b) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregated shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or</td>
</tr>
<tr>
<td></td>
<td>(c) Is exiting an institution (the individual has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution).</td>
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</tbody>
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<tr>
<td>2</td>
<td>(i) Individual or family who will imminent lose their primary nighttime residence, defined as:</td>
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<tr>
<td></td>
<td>(a) Residences will be lost within 14 days of the date of application for assistance;</td>
</tr>
<tr>
<td></td>
<td>(b) No subsequent residence has been identified; and</td>
</tr>
<tr>
<td></td>
<td>(c) The individual or family lacks the resources or support networks needed to obtain other permanent housing.</td>
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</tbody>
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<tr>
<td>3</td>
<td>(i) 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:</td>
</tr>
<tr>
<td></td>
<td>(a) Are defined as homeless under the other listed federal statutes;</td>
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<tr>
<td></td>
<td>(b) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</td>
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<td></td>
<td>(c) Have experienced persistent instability as measured by two moves or more during the preceding 12 months; and</td>
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<tr>
<td></td>
<td>(d) Can be expected to continue in such status for an extended period of time due to special needs or barriers.</td>
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<th>Category</th>
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<tbody>
<tr>
<td>4</td>
<td>(i) Individual or family who:</td>
</tr>
<tr>
<td></td>
<td>(a) Is feeding, or is attempting to fix, domestic violence;</td>
</tr>
<tr>
<td></td>
<td>(b) Has no other residence; and</td>
</tr>
<tr>
<td></td>
<td>(c) Lacks the resources or support networks to obtain other permanent housing.</td>
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</table>
Policies & Procedures

- Written procedures must establish the order of priority for documenting homeless history and should be collected in this order:
  - First
    - 3rd 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 3rd 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](https://www.hudexchange.info).

### Recordkeeping Documentation Options Explained

<table>
<thead>
<tr>
<th>3rd Party Documentation</th>
<th>Self Certification</th>
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<tbody>
<tr>
<td>Documentation from HMIS/Comparable Database</td>
<td>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.</td>
</tr>
<tr>
<td>Records must show entries/exits at Shelters.</td>
<td>Remember that for each Project:</td>
</tr>
<tr>
<td>An answer of “Yes” to the question as to whether the individual is chronically homeless (Universal Data Element 3.917) is not sufficient.</td>
<td>- 100% of households served can use self-certification for 3 months of their 12 months,</td>
</tr>
<tr>
<td></td>
<td>- 75% of households served need to use 3rd Party documentation for 9 months of their 12 months, and</td>
</tr>
<tr>
<td></td>
<td>- 25% of households served can use self-certification as documentation for any and all months.</td>
</tr>
</tbody>
</table>

**When do you need third party documentation?**
Documenting 3rd Party Verifications of Homelessness
Using Outreach/Intake Encounters as 3rd 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
Long-term homeless history, but not on your by-name list?
3rd Party Documentation from Alternative Sources

TEACHERS

HEALTHCARE PROFESSIONAL (FQHCS)

LAW ENFORCEMENT

SUPPORTIVE SERVICES
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
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

High utilizers of services

Database of services provided, hospitalizations, inpatient treatment, etc.

Oversight of network providers

Increased coordination and ability to refer in a streamlined process
• 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.
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
Document the Last 3 Years of Homeless History

- Sign and date it
- Scan it into HMIS
- Continue adding new information to build history
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
Join Us For Our Next Webinar
Next Tuesday, June 11th at 2pm

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