

Documenting Chronic Webinar

BRETT ESDERS: Hello and welcome to this short training on Using HMIS Enrollment History to Document Chronic Homelessness Status. This training is provided by HUD's Office of Special Needs Assistance Programs, or SNAPs.

BRETT ESDERS: I'm Brett Esders with the SNAPs office and I am joined today by my colleague Marcy Thompson, with ICF, a technical assistance provider for HUD.

BRETT ESDERS: Before we begin, it is important to understand that there are three separate, but related concepts at play when considering how HMIS can be used to assist in identifying people who are experiencing chronic homelessness.

This webinar is intended to help CoCs and HMIS Leads understand the fundamental distinctions between these concepts and to provide information that can be woven into appropriate provider and end-user trainings. This particular webinar covers using HMIS as a source of third-party documentation for a client's chronic homeless status, highlighted in the red box. This is achieved by looking at clients' entries and exits in HMIS, rather than the self-reported data collected at each project entry. This documentation process is only relevant for projects with chronic homelessness as an eligibility requirement.

The other, related concepts are:

Recording the information about a client's living situation in HMIS needed to calculate their chronic homeless status. Every HMIS-participating project has to record clients' living situations and disability status in HMIS at project entry and can simply record that information based on client self-response.

Reporting combines these two concepts by looking at self-reported data AND enrollment histories for each client to determine whether the person meets the definition of chronic homelessness at a point in time or over the course of a year.

BRETT ESDERS: This brief presentation is intended to provide more detail on one aspect of documenting chronic homeless status: namely, using HMIS records as third-party documentation of stays in emergency shelters, safe havens, or of encounters with street outreach workers. Today's webinar will not be an overview of the Final Rule or other sources of documentation such as third-party affidavits or self-certification.

MARCY THOMPSON: So now, let's turn to the discussion of how to actually use your HMIS records as third-party chronic homeless documentation.

MARCY THOMPSON: First, just to emphasize, HMIS records of enrollments in an emergency shelter or a safe haven, or contacts in a street outreach project can – and should - be used as third-party evidence for documenting chronic homeless status. This is because the actual enrollment data recorded in an HMIS is not the same as the client self-response to questions about their homeless history. The enrollment record means that the client was actually served in a project type that would indicate they were literally homeless at that time, such as an emergency shelter. Records of enrollment in HMIS do not require additional verification – they are third-party documentation.

Documenting Chronic Webinar

So, as we've discussed in the past, one night in an emergency shelter or Safe Haven or one contact by a street outreach provider is sufficient to serve as documentation for that entire month. This means that if the HMIS shows even just one street outreach contact during the month that you're done documenting for that month, unless there is evidence of a break. So, evidence of a break could be that the client is self-reporting that they were living in permanent housing for some period of time during the month, or the client's HMIS record shows, for example, a stay in PSH for three weeks within a month, then only the remaining balance that month could count as time homeless, and the rest would constitute a break.

It's recommended that you review HMIS records together with the client as you work to build a housing history and collect documentation. Doing this will likely be far more helpful than simply asking "how many times have you been homeless in the last 3 years" because walking through the client's housing history within HMIS may actually help them recall other details and dates that they otherwise not have thought to mention.

MARCY THOMPSON: There are lots of benefits to using HMIS data as documentation, but there are also some caveats:

So in a Continuum of Care with low HMIS participation rates, the HMIS will not provide a complete representation of time spent in projects. It should always be considered a starting point for documentation.

The validity of the HMIS data depends on the accuracy and timeliness of the data entry. Project start dates, housing move-in dates, and exit dates are all frequently reported as problematic with respect to timeliness. And these elements are particularly critical when documenting chronic homelessness using HMIS.

A gap in documentation does not necessarily constitute a break in homelessness. It may reflect time living on the streets where the person was not contacted by a street outreach provider, time spent in a project that does not participate in HMIS, or time experiencing homelessness in another CoC. In other words, to the extent a month is documented in HMIS without evidence of break, the provider does not need to seek out other sources of documentation. However, if a month is not documented in HMIS, the provider should and can seek out other documentation in order to complete the documentation process.

BRETT ESDERS: Based on questions we've received about how to use HMIS data as documentation, we have realized the need for more specific guidance. To help, we have developed detailed reporting specifications for an HMIS Client-Level Length of Time Homeless Report, pulling together all the data that would be needed to show whether a given month is documented as homeless, documented as not homeless, or lacking any documentation at all. The specifications have been provided to HMIS vendors. This report is entirely optional, however, HMIS Leads should work with their vendor to determine if producing it is useful for their CoC. The specifications are available so that if vendors and CoCs choose to produce this report, it will be consistent with HUD's expectations. CoCs that choose not to produce this report can also use the logic detailed in the specifications to review HMIS records and determine if they meet HUD's standards for serving as 3rd party documentation.

BRETT ESDERS: The report is broken into two parts. The first part of the report shows the rollup of a client's status in each month over a three year period. An "X" is used to indicate if any of the following occurred during that month:

- There was a documented street outreach or shelter status based on an HMIS enrollment that provides evidence of a client's stay there. It does not include any information self-reported by the client. In months that include time in a shelter or on the streets and no breaks, this may be used as documentation of chronic status for that month without additional verification.
- There was a self-reported street or shelter stay based on any self-reported 3.917 Living Situation data collected during the three-year period. This section is only used to fill in days not documented by HMIS entry and exit data. While this self-reported status does not constitute third-party HMIS documentation, if there is no documented street outreach contact, emergency shelter, or safe haven stay in the month, this may help in collecting accurate information for a new enrollment and in identifying potential sources of additional documentation.
- There is a documented break based on an HMIS record of 7 or more consecutive nights in permanent or transitional housing. If such a break is reflected in the HMIS within the last year, the client no longer meets the chronic homeless "consecutive time" definition. Staff should look for additional breaks to determine if the client has been homeless four or more separate times (for a total of 12 or more months) within the last three years. Additional documented breaks identified in the report can help support that, along with the fourth column showing...
- ... self-reported or potential breaks. This column is used to indicate that the client's response to a Living Situation data element at one or more project entries in the three-year period indicates a *non*-street or shelter living situation which lasted long enough to meet the definition of a break. These responses may not be entirely accurate, and should not be considered hard evidence of a break, but they can help the client recall additional periods of living in non-street or shelter situations.

BRETT ESDERS: The second table in the report provides detail on each time the client changed their living situation.

Each row in the display provides a description of the living situation and the first night and last night the client experienced it. This detail is intended to provide more backup to the month-by-month view and can be used to support client recall or aid staff in locating providers who may be able to provide third-party documentation when HMIS records are not available.

Let's walk through two examples for two separate clients to help us understand the report more fully...

BRETT ESDERS: Let's start with Bob. Bob is entering permanent supportive housing from a shelter on December 31st. At his intake interview, he tells us that he has been living on the streets or in shelters for the last year. His HMIS records show a series of shelter enrollments and street outreach contacts over the last year. Based on categorizing each of these records according to the programming specifications, the resulting summary table shows...

Documenting Chronic Webinar

BRETT ESDERS: ... that December, September, April through July, and January (7 months) have at least one encounter that counts toward documenting his chronic status. The report also shows that Bob has no documented breaks during the time that he tells us he was continuously homeless. So there are five months that are not documented through the HMIS, and we are then left with at least two months that will require pursuing third-party documentation...because remember, all heads of households may have up to 3 months of their time in shelter, safe havens, or on the streets documented by self-report. Obtaining the documentation may mean working with the street outreach providers the client is familiar with or, if no other documentation is available, working with the client on self-certification. If the provider cannot document at least 9 of the months using HMIS or other 3rd party documentation, the project may still serve the client because up to 25% of clients in a project may rely on self-certification entirely.

MARCY THOMPSON: Now let's talk about Jane. Jane tells us she's been in and out of homelessness for the last several years. And her HMIS record definitely shows a series of shelter enrollments, street outreach contacts, but also shows some enrollments in permanent housing, and a few self-reported periods in jail that lasted longer than 90 days. Categorizing each of these records according to the programming specifications, the resulting summary table shows the following...

MARCY THOMPSON: ... we see that December, September, July, June, and April have at least one encounter that counts as time spent living on the streets or in an emergency shelter. We can also see that Jane had one documented break in May. Let's look at the detail to understand further...

MARCY THOMPSON: Here we see the status view. The details show that, although she had four nights in permanent housing in November, this does not constitute a break, since a break has to be 7 nights or more. The May permanent housing enrollment, however, lasted from May 8th to May 19th, more than 7 nights, and so it does get a "Documented Break" status.

MARCY THOMPSON: So since there is evidence of a break in May, we now have to work with the client to determine if she meets the definition of chronically homeless using the episodic criteria. Because we now know that she does not meet the definition of chronic homelessness based on being continuously homeless over the last 12 months. So we need to find out if she had at least 4 occasions of residing on the streets, in an emergency shelter, or in a safe haven over the past 3 years for a total of 12 months:

- First thing we'll need to do is find at least two additional breaks in her experience of homelessness in the previous three year period. We can see that she's provided a response in February that would suggest a break, which is a good start.
- Assuming that there is another break in her history, she appears to have at least 7 additional months of homeless experience that would bring her to the required 12 month total. As with Bob, we will now need to pursue other third-party documentation sources to ensure that we have at least 9 months in total documented via 3rd party sources.

BRETT ESDERS: The determination of time spent in an emergency shelter, safe havens, and on the streets, as well as identifying breaks and documenting these stays and breaks, can be time consuming. We hope that making these report specifications available to vendors and HMIS Leads will help providers in collecting required documentation. Even if the report isn't available

Documenting Chronic Webinar

in your system, the guidelines can help HMIS system administrators and providers deepen their understanding of the requirements for using an HMIS record as third party documentation.

Here are a few additional tips for CoCs, HMIS Leads, and providers to keep in mind.

BRETT ESDERS: Increase the coverage of your CoC's HMIS. The more street outreach providers, emergency shelters, safe havens, and transitional and permanent housing projects that are regularly submitting data to the HMIS the better chance you will have of being able to use HMIS to entirely document someone's chronic status.

Additionally, work with providers to increase data quality. Being able to use a provider's record is contingent upon them routinely entering accurate and complete data in a timely manner.

BRETT ESDERS: Remember, data element 3.917 is based on self-reported information from the client. If you find an error in what is reported there as you are collecting documentation for someone's chronic status you may correct it. But because it is self-reported it may not always match the documentation you are able to obtain.

BRETT ESDERS: Listed up on your screen now are some additional resources on chronic homelessness and HMIS that are available on the HUD Exchange and we encourage you to check out the materials that are linked here.

BRETT ESDERS: If you have any additional questions about using HMIS to report on chronic homeless status, please use the AAQ function on the HUD Exchange. Thanks for listening to this brief presentation and we hope it helps.