

Office of Community Planning and Development

Report on the Convening Session on the Definition of “Chronically Homeless”

Section 1. Convening Session Overview

On January 4, 2012, the interim rules for the *Emergency Solutions Grant* (ESG) program and corresponding amendments to the *Consolidated Plan* went into effect. The comment period closed on February 3, 2012. The Consolidated Plan Interim Rule defines a chronically homeless household as a disabled individual or family, where the head of household is disabled, who is literally homeless and has been such for at least one year *or* on at least four separate occasions in the last 3 years, where each occasion lasted for at least 15 days. The interim definition replaced the term “episode” with the term “occasion” and specified a minimum *duration of time* for occasion.

The majority of comments received from the public on this definition were specifically related to how the term “occasion” is defined. Many communities have operationalized chronic homelessness by defining distinct episodes as those that are separated by a specific period of housing (e.g. 30 days). The Interim rule definition states that each homeless occasion must have lasted for at least 15 days. It does not, however, provide further detail on how to determine an “occasion.”

On May 30, 2012 HUD convened a group of national experts to help inform HUD’s deliberations on the definition of chronic homelessness. The purpose of this convening was to bring together national experts to discuss the definition, specifically related to the term “occasion.” The discussion centered on whether or not HUD should establish a minimum duration for each occasion, what constitutes the start and end of an occasion, and whether or not there should be a minimum length of time that must elapse between occasions.

HUD was not seeking consensus from the group, but rather informed opinions that would help ensure the definition of chronically homeless targets those persons we most want to serve, and that any definition used by HUD can be reasonably operationalized at the local level. In addition to the discussion, HUD received written statements by many of the participants in the group that provided justification for specific positions.

This group of experts included researchers, advocates, homeless service providers, homelessness technical assistance providers, as well as Federal representation from HUD, the United Interagency Council on Homelessness (USICH), and the Department of Health and Human Services (HHS).

HUD provided focus questions to the invitees in advance of the meeting to ensure that the discussion centered primarily around how to define “occasion” in the definition. The specific questions that were discussed are as follows:

Office of Community Planning and Development

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1. Should HUD establish a *minimum duration* of time for each occasion? If yes, what should that standard be and what is the rationale for the standard?
2. Should HUD include in the definition a standard to measure the *start and end* of an occasion of homelessness?
3. Should HUD define a minimum length of time that must elapse between each occasion in order for the specific period of time to be considered a separate occasion?

HUD also requested that specific participants submit comments to these questions in writing in advance of the meeting and that those invitees unable to attend would also submit their thoughts on this subject matter in writing.

Section 2. Summary of Discussion

Below is a summary of discussion points from the meeting that contributed to how HUD determined to define chronically homeless.

- Community Solutions, the organization behind the *100,000 Homes Campaign* stated that 60 percent of the people they encounter living on the street at 4am are chronically homeless and 90 percent have been homeless for 12 months or longer.
- Communities need to use HMIS as well as other methods (i.e., interviews) to determine whether or not a person meets the definition of chronically homeless.
- Instead of focusing on number of occasions or length of those occasions, a more practical approach could be to move towards a cumulative period of time homeless.
- It is more intuitive to think about episodes in months rather than days.
- The chronic homeless category should be limited to the persons with the highest level of need and longest histories of homelessness. If given the choice, providers tend to choose persons that are the easiest to serve, which is not in the intention.
- 12-months or one-year is the right period of time as it is consistent with length of continuous time required under that part of the definition.
- Need to standardize how PIT counts are conducted to ensure that all communities are counting and classifying persons consistently.
- Need to consider way to not exclude persons in and out of short-term stays in institutions, particularly jail.
- Concerns related to 12-months:
 - Push back from Continuums of Care
 - Difficult to make people wait that long
- Balance needed between flexibility at the local level and narrower definitions with greater guidance.

Office of Community Planning and Development

Report on the Convening Session on the Definition of “Chronically Homeless”

- Episodes can be loosely defined, as long as cumulative time homeless meet 12 month standard.

Section 3. Conclusion

Although HUD did not seek consensus, the overwhelming majority of the group did come to agreement on a recommendation to HUD. Below is a summary of the key points:

- Revise the portion of the definition that refers to occasion to focus on the cumulative length of homelessness, rather than the length of each occasion.
- Require a cumulative length of homelessness of one-year, noting that the actual number of days would not need to be counted. Instead, a single encounter on a single day in a month could count as the entire month.
- Provide clear guidance to communities on acceptable and appropriate methods to document chronic homelessness for the purposes of the point-in-time count and determining eligibility for permanent supportive housing (PSH) beds designated to serve chronically homeless persons.
- Consider ways to use the NOFA to prioritize PSH to serve persons with the longest histories of homelessness and that are perceived to be the hardest to serve.
- Consider ways to assess HUD performance requirements in a way that would not inadvertently penalize providers for serving persons that are the hardest to serve.

Office of Community Planning and Development

Report on the Convening Session on the Definition of “Chronically Homeless”

Section 3. List of Participants

First Name	Last Name	Organization
Sherri	Boyd	HUD
Christine	Brown	HUD
Michelle	Budzek	The Partnership Center
Marti	Burt	Urban Institute
Alvaro	Cortes	Abt Associates
Dennis	Culhane	University of Pennsylvania
Deb	DeSantis	Corporation for Supportive Housing
Anne	Fletcher	HUD
Brett	Gagnon	HUD
Kristy	Greenwalt	USICH
Jonathan	Harwitz	HUD
Lisa	Hill	HUD
Jennifer	Ho	USICH
Mark	Johnston	HUD
Jill	Khadduri	Abt Associates
Marcella	Maguire	City of Philadelphia
Marge	Martin	HUD
Laura	Meixel	HUD
Ann	Oliva	HUD
Robyn	Raysor	HUD
Michael	Roanhouse	HUD
Emily	Rosenoff	HHS
Lora	Routt	HUD
Mike	Shore	Community Solutions
William	Snow	HUD
Brooke	Spellman	Abt Associates
Marcy	Thompson	HUD