

# How To – Document Length of Time Homeless in WISP

Institute for Community Alliances

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## PURPOSE OF GUIDE

The purpose of this guide is to equip Wisconsin Service Point (WISP) Users to accurately and consistently document clients' length of time homeless according to a uniform and comprehensive data entry procedure in compliance with the [HMIS Data Standards Manual](#) (2014).

This guide also outlines HUD's definition of Chronic Homelessness as articulated in the [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining "Chronically Homeless" Final Rule](#) (December, 2015) to provide context for the Chronic Homeless Determination questions and additionally suggests supplemental documentation practices to expedite a client's entry into Permanent Supportive Housing, if deemed appropriate through the Coordinated Entry process.

## CHRONIC HOMELESSNESS: DEFINITION & CALCULATION, DOCUMENTATION

The primary purpose for documenting length of time homeless is to establish eligibility for community resources available only to those whose experience meets HUD's definition of Chronically Homeless.

In the Milwaukee Continuum of Care, length of time homeless also informs prioritization for housing placement through Coordinated Entry.

### HUD Definition of Chronic Homelessness

In the [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining "Chronically Homeless" Final Rule](#) (December, 2015), HUD establishes that a client is **Chronically Homeless** if they meet the following criteria:

1. Has a disability,
2. Is currently living in a place not meant for human habitation, a safe haven, or emergency shelter, AND
3. **Whose documented homeless history meets one of two thresholds:**
  - a. 12+ months of continual residence in a place not meant for human habitation, a safe haven, emergency shelter, or a combination of these; **OR**
  - b. 4 or more separate episodes of living in a place not meant for human habitation, a safe haven, emergency shelter, or a combination of these in the past 3 years, with the total number of months homeless totaling 12+ months.

### Calculating Length of Time Homeless

There are specific rules that govern the calculation of a client's history of homelessness:

1. **Any single day of documented contact between a client and service provider** where the client was living in a place not meant for human habitation, a safe haven, or emergency shelter is countable as covering the entire month in which that day falls.

The **ONLY** exception occurs when there is documented proof of a break in homelessness. In that case, we have to count the actual days in that month that were spent living in a place not meant for human habitation. When entering data in Service Point, counted days should be rounded up

or down to the nearest month.

2. **Breaks in homelessness** are defined as any 7-night period when a client was **NOT** living in a place not meant for human habitation, a safe haven, or emergency shelter. There are **additional rules** governing the determination of breaks:
  - If a client becomes homeless after a period of stay at an institution care setting such as a hospital, psychiatric facility, detox center, or correctional facility AND
    - They stayed there fewer than 90 days, AND
    - Were living in a place not meant for human habitation, a safe haven, or emergency shelter prior to their entry into the institution setting, THEN...

The time spent in that setting does not count as a break in homelessness and can instead be added to the total documented number of months a client has been homeless.

- Following a client's initial experience of homelessness, successive **episodes of homelessness** must be preceded by a break in homelessness. **If there are no breaks** in a client's history of homelessness, all months are considered part of the same continuous episode.

## DOCUMENTING LENGTH OF TIME HOMELESSNESS

Documentation of length of time homeless occurs across three stages: The Homeless History Interview, Service Point Data Entry, and Data Supplementation.

These stages intersect with the Coordinated Entry Process for permanent housing prioritization and placement. Since the person that gathers information, enters the data, and works with the client to secure and compile additional documentation may differ, it is imperative that consistent data protocols are observed to create continuity in the Coordinated Entry process.

### The Homeless History Interview

The Homeless History Interview is the first step in documenting a client's length of time homeless. Case managers are required to complete the *Homeless History Tracking Form*. This document uses existing Service Point and 3<sup>rd</sup> party documentation, along with client self-report to establish a housing history going back three years from the interview date.

Case Managers or Street Outreach workers should observe the following guidelines when conducting Homeless History Interviews:

- ❖ It is recommended that interviews take place after a client has been established in a program (i.e.: not at immediate intake/contact) for the purpose of building rapport and making a preliminary determination regarding a client's eligibility for housing placement through

coordinated entry.

- ❖ A client's Service Point record should be reviewed prior to the interview, to begin filling out the Homeless History Tracking Form.
  - Historical data, such as ShelterPoint and Entry/Exit records can be reviewed on a client's Summary tab.
    - Street Outreach Entry/Exits must be verified by a corresponding Service Transaction for each month covered by the Entry/Exit record in order for the month to be counted, as these programs commonly retain clients in their programs for up to 90 days after their last contact with a client.<sup>1</sup>
  - Any previously uploaded 3<sup>rd</sup>-party verification documentation should also be downloaded and reviewed. These can be found in the File Attachments sub-assessment near the bottom of the Client Profile tab.
  - Any gap in the record that exceeds 7 days, including any non-verified period of time included in a Street Outreach Entry/Exit, should be left as a blank row in the Homeless History Tracking Form (though dates should be noted).
- ❖ During the interview, it is the responsibility of the interviewing case manager to guide the client through the self-report process. This may include...
  - Asking follow-up questions to get a better picture of a client's history,
  - Sharing information from the client's documented record of service utilization in Service Point to help jog the client's memory, or
  - In cases of high acuity mental health and AODA barriers to accurate self-report, overriding client's self-report based on professional knowledge of a client's history of homelessness.
- ❖ If a client does not recall their living situation and there is no other documentation for a period of time, "Don't Know" is a valid response.
  - For the sake of preliminary determination, staff completing the interview should make a determination on whether it is likely that the client was homeless during a period based on the living situations immediately prior and after the undefined period.
  - In cases where these periods affect the determination of chronic homeless status, the period may be counted as homeless if documentation is acquired or self-reported by the client as a break without further documentation.

Once the *Homeless History Tracking Form* has been completed, the interviewing staff or designated data entry staff should upload the document into Service Point. **See *Appendix A* for upload instructions.**

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<sup>1</sup> In lieu of verifying service transaction records, the Outreach Contacts sub-assessment should be reviewed. It can be found near the bottom of the Client Profile tab of a client's Service Point record.

## The Chronic Homeless Determination Questions

The Chronic Homeless Determination Questions are a set of HUD-specified data fields in HMIS that reflect a client’s living situation prior to project entry and, by extension, identify clients that may be experiencing chronic homelessness in our community.

These data fields can be found on both the Client Profile and Summary tabs in the client’s record. However, for the purpose of Coordinated Entry, staff should complete the expanded version of the questions that are found on the Coordinated Entry Assessment (available through the Assessment’s tab of the client’s record).

Since the Coordinated Entry Assessment is completed after a client has undergone preliminary assessment of need—either through professional staff observation or completion of the VI-SPDAT—the **Chronic Homeless Determination Questions on the Coordinated Entry Assessment should reflect the client’s current living situation, as opposed to their situation prior to project entry.** Additionally, the responses in these fields should match the counts obtained through the Homeless History Tracking Form.

The questions always appear as a set and look like this:

**Chronic Homeless Determination Information**

**For this Section - Only include time on Street, in an Emergency Shelter, or Safe Haven**

Residence Prior to Project Entry	<input type="text" value="Place not meant for habitation (HUD)"/>
Length of Stay in Previous Place	<input type="text" value="-Select-"/>
Approximate date homelessness started:	<input type="text" value=""/> / <input type="text" value=""/> / <input type="text" value=""/>
Regardless of where they stayed last night - Number of times the client has been on the Streets, in Emergency Shelter, or Safe Haven in the past three years including today	<input type="text" value="-Select-"/>
Total number of months homeless on the Street, in Emergency Shelter or Safe Haven in the past three years	<input type="text" value="-Select-"/>
If more than 12 Months homeless on the street, in emergency shelter, or safe haven, Enter Total Number of Months in Past 3 Years	<input type="text" value=""/>

This question is ONLY found on the Coordinated Entry Assessment and is used to inform prioritization for clients determined to be chronically homeless.

There are two versions of the Chronic Homeless Determination Questions, both of which will provide the necessary information for determining a client’s current chronic homelessness status in HMIS:

- If your program is an **Emergency Shelter, Safe Haven, or Street Outreach** provider, you will automatically see all the above questions regardless of a client’s prior living situation because, by virtue of being served by your program, the client is flagged as literally homeless by Service Point.
- If your program is **NOT** an Emergency Shelter, Safe Haven, or Street Outreach provider, data entered for the client’s prior living situation will determine whether further questions will need to be completed through conditional logic. Clients served by non-Shelter/-Safe Haven/-Street Outreach providers are not automatically assumed to be literally homeless, and the use of conditional logic limits the amount of data collection to only that information required to determine chronic homeless status. Additional fields may appear based on responses to each question.

## Answering the Chronic Homeless Determination Questions

Staff should ask clients about their homeless history, including specific instances the client spent on the street, in an emergency shelter, or Safe Haven project. This may require explaining what each of these situations are, based on the HUD definition for each.

### 1. Residence Prior to Project Entry

Record the type of living arrangement of the head of household and each adult household member was residing in **just prior to entry into your project**. The living situations are listed through a drop-down box and have been divided into three different situations: **Literally Homeless; Institutional; and Transitional and Permanent Housing**.

### 2. Length of Stay in Previous Place

Record the length of time the client was residing in just their previous place of stay. **Note** – the response for this field will not necessarily match up with the response to the Approximate Date Homelessness Started question, specifically in cases when a client has moved between multiple living situations that would be categorized as Literally Homeless.

### 3. Approximate Date Homelessness Started

Record the Approximate date **this episode** of homelessness began. This question is NOT asking for the date a client first experienced homelessness UNLESS the client has been continuously staying in an Emergency Shelter, Safe Haven, or place not meant for habitation (“the streets”) since that time.

**Key concepts for determining Approximate Date Homelessness Started:**

- a. Have the client look back to the date of the last time the client had a place to sleep that was not on the streets, ES, or SH.
- b. As the client looks back, there may be breaks in their stay on the streets, ES, or SH. The breaks are allowed to be included in the look back period to calculate the approximate start date ONLY:
  - i. If the client moved continuously between the streets, shelters, or safe havens. The date would go back as far as the first time they stayed in one of those places; or
  - ii. If the break in their time on the street, ES or SH was less than 7 nights. A break is considered 6 or less consecutive nights not residing in a place not meant for human habitation, in shelter or in a Safe Haven. The look back time would not be broken by a stay less than 7 consecutive nights; or
- c. If the break in their time on the streets, ES, or SH was less than 90 days due to an institutional stay (i.e. jail, substance abuse or mental health treatment facility, hospital, or other similar facility). The look back time would include all of those days (up to 89 days) when looking back for the start date.
- d. If the client knows the actual date – enter the date they indicate. If they know the month and year but not the day, the worker may substitute the day of the month with the same day of the month as project entry. For example: a client enters the project on March 15, 2015. During the intake interview, the client answers the start date question with a response of “a couple of months”. The worker clarifies - “It’s March, would that mean you started sleeping on the streets in January this year?” Client affirms, yes, January. The worker clarifies: “Do you know the day?” Client responds: “no.” - Worker then enters January 15 (day of the month of project entry), (this year).
- e. If the HMIS displays information about the person’s entry date on the streets, ES or SH, the worker may share that information with the client to help jog their memory. However, administrative information may not be substituted for the information provided directly by the client or entered in lieu of asking the client the question.

4. Regardless of where the client stayed last night enter the number of times the client has been homeless on the streets, in ES, or SH in the past three years including today.

This question captures the number of separate episodes of homelessness a client has experienced, and should be determined through the client interview. If this is the first time the client has been homeless in the past three years then the response is "One Time."

5. Total number of months homeless on the Streets, in ES, or SH in the past three years.

This question captures the total number of months homeless across all episodes in the past 3 years.

Responses are either:

- a. *One month - this is the first month* - Meaning in the past three years this is the first month the client has resided on the Streets, ES, or SH.
  - b. *A selection between 2-12 months* - Count the total number of months the client indicates they have been on the streets, ES, or SH in the past three years. For example, if the client has been on the streets, ES, or SH since January and it is now March, the cumulative total would be 3 months (January = 1, February = 2, and March = 3). If they were also homeless for a month back in October, the cumulative total would then be 4 months.
  - c. *More than 12 months* – In this case, the staff entering or updating the client's information would also input the actual figure in the text box for question #6.
6. If More than 12 Months Homeless on the Streets, in Emergency Shelter, or Safe Haven, Enter Total Number of Months in Past 3 Years.

This question is ONLY found on the Coordinated Entry Assessment and is used to inform prioritization for clients determined to be chronically homeless. **Since the question looks back to the last 3 years, the figure entered should not exceed 36 months.**

NOTE: Although documentation is required by some funders for programs targeting chronic homeless persons, completing the data fields in HMIS does not require documentation -- a client's responses are all that is required.

## Data Supplementation: Preparing for Permanent Supportive Housing Placement

The information entered into the Chronic Homeless Determination fields are used for preliminary identification of chronic homeless status and do not by themselves qualify as formal documentation for confirming Permanent Supportive Housing eligibility.

Following the Housing History Interview and the completion of the Coordinated Entry Assessment (including the Chronic Homeless Determination Questions), it is the responsibility of the Coordinated Entry-designated Contact Person to facilitate the gathering of 3<sup>rd</sup> Party documentation to verify client's self-reported periods of homelessness.

### HMIS records as 3<sup>rd</sup>-Party Documentation

Service Point Entry/Exits for Safe Haven and ShelterPoint enrollment records are considered to be acceptable forms of 3<sup>rd</sup> party verification for homelessness.

While Outreach Entry/Exits, supplemented by a corresponding Service Transaction or Outreach Contact record, are sufficient for preliminary calculation of length of time homeless, further documentation, usually in the form of a 3<sup>rd</sup> Party Verification Letter, is required for final verification.

To use HMIS records as formal documentation, staff should print time-stamped screen-shots of the client's Entry/Exit, ShelterPoint, and Outreach Contact histories, omitting or censoring any unnecessary client information.

### Non-HMIS 3<sup>rd</sup>-Party Length of Time Homeless Documentation

Non-HMIS documentation of length of time homeless includes 3<sup>rd</sup> Party Verification Letters (from service providers or non-familial community members), municipal citations or other public records from which homelessness can be inferred, and, in cases of last resort, client self-certification with documentation of attempts to obtain 3<sup>rd</sup> party verification. **All length of time homeless documentation should be uploaded into Service Point and be visible to all users system-wide.**

### Supplemental Documentation for Chronic Homeless Determination and Housing Placement

Aside from those used to track and verify length of time homeless, documents pertaining to Chronic Homeless determination and Coordinated Entry housing placement are NOT currently uploaded into HMIS but instead remain in the possession of the agency that obtained them OR are submitted directly to Coordinated Entry staff through a secure channel.

Such supplemental documents include:

- Medical Statements of Disability
- Copies of Housing Applications
- Birth certificate, Social Security card, or any personal identification card copies

In order to keep track of what documentation has been collected and what documentation remains to be collected, Coordinated Entry Contact Persons are instructed to update the bottom section of the Coordinated Entry Assessment whenever additional documentation is obtained and to list the staff/agency in possession of the documentation in the notes section:

**Housing Verification Documents Attached**

Proof of Homelessness	<input type="checkbox"/> No ▼ G
Income Verification	<input type="checkbox"/> No ▼ G
Disability Verification	<input type="checkbox"/> Yes ▼ G
Birth Certificate	<input type="checkbox"/> Yes ▼ G
Explanation if documentation not attached	<input type="checkbox"/> <a href="#">Zach Ehmann (ICA)</a> sent copies of Birth Certificate and Medical Statement of Disability to <a href="#">Donna Whitson-Jones (IMPACT Coordinated Entry)</a> through encrypted email on 4/20/2017.

## APPENDIX A: SERVICE POINT FILE UPLOAD INSTRUCTIONS

All supplemental documentation of homelessness should be uploaded into Service Point. For the purpose of Coordinated Entry, staff should upload documentation directly to the Coordinated Entry Assessment by clicking the “binder clip” icon near the top right corner of the Assessment:



Select an Assessment

Coordinated Entry Assessment - Milwaukee CoC

Submit

Coordinated Entry Assessment - Milwaukee CoC



Following upload, any Service Point user can access documents either by clicking the Binder Clip icon on the Coordinated Entry Assessment or through the File Uploads sub-assessment, found near the bottom of the Client Profile tab:

File Attachments								
		Date Added ▼	Name	Description	Type	Provider	Added From	
			10/12/2015	PHC-jeans.jpg	Homeless Verification Letter 1-1-2016 to 2-3-2016	jpg	Institute for Community Alliances - Wisconsin	Client Profile 

Add New File Attachment

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When a file is uploaded, a description must be added that follows a standard naming convention:

*[Document Type\_date range reported]*

For example:

*Client Self-Certification\_3-1-2016 to 6-15-2016*