

Columbus and Franklin County  
*Homeless Crisis Response System*  
**Street Outreach Business Rules**

## Definitions

**Unsheltered:** An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground

## Documentation Standards

### *Initial Enrollment, Monthly Contacts, and USHS/PSH documentation of unsheltered time*

- Direct observation documented in writing by an authorized outreach provider<sup>1</sup> of the conditions where the individual or family was living. This may be the outreach provider directly assisting the person or another authorized outreach provider. The outreach worker must physically observe the individual or family residing in a place not meant for human habitation. Information can be documented on [USHS Verification of Street Homelessness](#) form, a monthly contact form, or equivalent form. Written observation must include:
  - A signed certification by the authorized outreach worker;
  - Client's name;
  - Date and time of contact; and
  - Description of location of where the client was observed as unsheltered.
  
- Third-party verification documented in writing by the third-party (e.g., letter) or outreach worker (e.g., case file record of conversation with third-party). Third-party verification is only acceptable if attempts to directly contact client fail. Information can be documented on [USHS Verification of Street Homelessness](#) form, a monthly contact form, or equivalent form. Written third-party verification must include:
  - A signed certification by third party OR outreach provider;
  - Client's name;
  - Date and time of contact;
  - Description by the third party or outreach worker of location where the client is living; and
  - A summary of steps taken to directly observe client's unsheltered living situation or otherwise directly contact client and why that didn't occur.

Note:

  - Third-party confirmation alone is acceptable for documenting breaks of at least 7 consecutive nights not living unsheltered or residing in an emergency shelter.

### *Initial Enrollment and Monthly Contacts ONLY (not acceptable for USHS/PSH documentation of unsheltered time)<sup>2</sup>*

- Self-certification documented in writing. Written self-certification must include:
  - A signed certification by the individual or head of household AND outreach provider;

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<sup>1</sup> Authorized outreach providers: Capital Crossroads Outreach, Huckleberry House YOP Shop & CARR Team, LSS FM SSVF Outreach, Maryhaven Outreach, Mount Carmel Mobile Unit, Salvation Army RRH, Southeast PATH, VA Outreach, VOA SSVF Outreach, and YMCA RRH.

<sup>2</sup> Per HUD, only extremely limited allowances are made for self-certification for HUD funded PSH eligibility documentation purposes.

- Client's name;
- Date and time of contact;
- Description by the outreach worker of location where the client is living; and
- A summary of steps taken to directly observe client's unsheltered living situation and why that didn't occur.

Note:

- If direct contact is via phone, outreach must obtain verbal certification upon reading self-certification statement and indicate verbal certification on form.
- Self-certification is acceptable for documenting breaks of at least 7 consecutive nights not living unsheltered or residing in an emergency shelter.

## Program Enrollment, Contacts, and Program Exit

### **Street Outreach Enrollment (Project Start Date):**

- i. Currently unsheltered person should be enrolled with a Project Start Date in a street outreach program beginning with the date of first direct contact with an outreach worker, verification and documentation of unsheltered homelessness via direct observation, third-party verification, or self-certification (per above Documentation Standards) and collection of all HMIS/CSP Universal Data Elements. This should be reflected in the client's file.
  - When initially contacting an unsheltered person, Outreach should attempt to collect all CSP required data. Only enter in CSP and formally enroll client with a "Project Start Date" when all Universal Data Elements are collected. The "Project Start Date" should be entered into CSP as the first direct contact date, regardless of when all data elements are collected.
  - If another authorized outreach provider first has direct contact with someone and then client is referred to a second outreach provider, the second outreach provider may back-date the Project Start Date to the first date of direct contact with the first outreach provider, if documented in the client file.
  - All contacts should be documented according to outreach documentation standards, above.
  - Program enrollment should occur within 90 days after initial direct contact. While outreach may back-date enrollment to date of first direct contact, that should typically be a date within the past 90 days. CSB will not accept documentation of time spent homeless for contacts that occur more than 90 days prior to enrollment unless outreach has received prior approval from CSB, per below.
    - If client is enrolled more than 90 days after initial direct contact and outreach staff want to back-date enrollment to first direct contact and document time homeless for direct contacts that occurred more than 90 days prior to enrollment, then outreach must notify Erin Maus, CSB System Manager, via email for approval to back-date enrollment to date of first direct contact and documentation of unsheltered homelessness (per above Documentation Standards) and to approve documentation of unsheltered time for time greater than 90 days before enrollment. Request should be sent via email. Email approval from CSB System Manager must be included in USHS application.

### Monthly contacts:

- i. All street outreach projects are expected to record every contact made with each client. Street Outreach should attempt to locate and confirm current clients are still unsheltered via direct contact with client at minimum once per month (i.e., an outreach 'contact').
  - o If direct client contact occurs via phone, outreach must ask where client stayed the night prior to confirm if unsheltered and document the phone interaction and details of current situation as discussed with client, per documentation standards above.
  - o For clients not directly contacted, third-party verification (e.g., confirmation from law enforcement of client currently being unsheltered) or self-certification may be used as means of verification of continued unsheltered homelessness only if efforts to directly contact client are attempted and documented in client case file per documentation standards above
  - o Multiple monthly contacts may be documented on a single contact record (e.g., PATH contact form) or case notes kept in the client case file.

### Street Outreach Program Termination/Exit (Project Exit Date):

- i. If no direct contact with client or third-party confirmation after 30 days, client should be exited unless there is reason to believe person is still unsheltered.
- ii. If no direct contact or third-party confirmation after 60 days, client should be exited unless there is reason to believe person is still unsheltered.
- iii. If no direct contact or third party confirmation AND documentation that client remains unsheltered after 90 days, client should be exited.
- iv. If a client is not literally homeless (unsheltered or in shelter) for 7 or more days (e.g., client staying on a friend's couch), then client should be exited from the outreach program in CSP.
  - o For PATH clients, client should then be enrolled in Services Only Program in CSP. This is consistent with HUD's definition of a homeless "episode" and ensures CSP data does not overstate time client is unsheltered.
  - o Outreach clients entering shelter: Outreach exit date should be the date the client entered shelter and their destination recorded as "emergency shelter". Outreach may change the exit destination within 60 days if the client is permanently housed from shelter. The Outreach exit date does not change.
  - o Outreach clients staying with friends/family: Outreach exit date should be the confirmed date the client moved in with family/friends. If this date can not be obtained then the exit date should be the last date of contact.
  - o Outreach clients entering an institution (e.g., jail, hospital): Outreach may choose to keep the client actively enrolled in outreach and not exit from CSP if outreach believes client will be in the institution for less than 90 days AND is likely to return to unsheltered situation.

- o Outreach clients entering permanent housing: Outreach exit date should be the confirmed date the client entered housing. If this date can not be obtained then the exit date should be the last date of contact.
- v. Outreach exit dates (Project Exit Date) should be based on the last date of Outreach service or last direct contact with the client.
- vi. CSP data entry should mirror the above and client file should be consistent with the above

**Services Only (SE/PATH only):**

- i. If client is unsheltered for more than 7 days, then exit and re-enroll in Street Outreach program in CSP (if intend to continue assistance). The client file should reflect this change.

**Monthly Program-Level Quality Assurance:**

- i. Programs will review open outreach cases at least monthly to ensure unsheltered status for each client was verified within last 30 days and documented according to standards above.