

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

Acceptable documentation of unsheltered homeless status at program enrollment and for each contact includes one of the following:

For Initial Enrollment, Monthly Contacts, and USHS/PSH Documentation of Unsheltered Time

- Direct observation documented in writing by an authorized outreach provider* of the conditions where the individual or family was living. The outreach worker must physically observe 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 outreach worker;
 - Client's name;
 - Date and time of contact; and
 - Description of location of where the client was observed as unsheltered.

- Direct observation documented in writing by another authorized outreach provider of the conditions where the individual or family was living. The outreach worker must physically observe individual or family residing in a place not meant for human habitation. Information can be documented on [USHS Verification of Street Homelessness](#) or equivalent form. Written observation must include:
 - A signed certification by the authorized outreach provider;
 - Client's name;
 - Date and time of contact; and
 - Description of location of where the client was observed as unsheltered.

For Monthly Contacts ONLY (not acceptable for initial enrollment or USHS/PSH documentation of unsheltered time)¹

- Self-certification documented in writing. Written self-certification must include:
 - A signed certification by the individual or head of household AND outreach provider;
 - 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 contact is via phone, outreach must obtain verbal certification upon reading self-certification statement and indicate verbal certification on form.

¹ Per HUD, only extremely limited allowances are made for self-certification for HUD funded PSH eligibility documentation purposes. Not feasible to allow as normal default standard due to high risk of non-compliance at individual project level and high cost of tracking and monitoring.

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

*Authorized outreach providers: SE PATH and HOST Outreach, Maryhaven Outreach, Mount Carmel Mobile Unit, Capital Crossroads, VOA and LSS FM SSVF Outreach, VA Outreach

Outreach Enrollment/Exit Business Rules

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 physical contact with an outreach worker, consistent with HUD and SAMHSA HMIS guidance for PATH, 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" can occur prior to the date the CSP required data is collected, at the first physical contact date.
 - If another authorized outreach provider first has contact with someone in unsheltered location 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 contact with the first outreach provider.
 - All contacts before and after enrollment should be documented according to outreach documentation standards, above.
 - Program enrollment should occur within 90 days after initial contact. While outreach may back-date enrollment to date of first physical contact in an unsheltered location, 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 contact and outreach staff want to back-date enrollment to first physical contact in unsheltered location 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 physical contact in unsheltered location and to approve documentation of unsheltered time (per documentation standards) 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.

Street Outreach Contacts:

- i. Street Outreach attempts to locate and confirm current clients are still unsheltered via direct physical contact with client occurs at minimum once per month (i.e., an outreach 'contact')
- ii. At program enrollment and at least every 90 days: Street outreach must directly confirm and document unsheltered homelessness per written observation documentation standards above.
- iii. Interim contacts occurring each month only:
 - o If 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
- iv. 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):

- v. If no direct contact with client after 30 days, client should be exited unless there is reason to believe person is still unsheltered.
- vi. If no direct physical contact after another 30 days, client should be exited unless there is reason to believe person is still unsheltered.
- vii. If no contact after 90 days, then client should be exited without exception. (This is consistent with SAMHSA policy for PATH).
- viii. If a client is not unsheltered for 7 or more days (i.e., client moves to any situation besides unsheltered, including entering shelter, an institution, staying on friend's couch, etc), 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", as well as homeless documentation standards recently clarified for the Engagement Center.
- ix. Outreach exit dates (Project Exit Date) should be identical to the date of last physical contact with the client when they were directly observed to be unsheltered. This is consistent with HUD and SAMHSA HMIS guidance for PATH.
- x. 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 (if intend to continue assistance). The client file should reflect this change.
- ii. CSP data entry should mirror the above and client file should be consistent with the above

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.

HUD/HHS PATH HMIS Manual: <https://www.hudexchange.info/resources/documents/PATH-Program-HMIS-Manual.pdf>