

**Chicago Alliance to End Homelessness Comments on the  
Homeless Emergency Assistance and Rapid Transition to Housing  
Revisions to the Definition of “Chronically Homeless”  
May 2013**

Thank you for the opportunity to submit comments on the Revisions to the Definition of “Chronically Homeless”, which was published as part of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH): Rural Housing Stability Assistance Program Proposed Rule. The Chicago Alliance to End Homelessness (the Alliance) works to create, support, coordinate, and sustain effective strategies to end homelessness in Chicago. As the applicant for the HUD homeless assistance funding, the Alliance is a key player in administering over \$54 million that Chicago receives annually to provide housing and services to homeless individuals and families. The following recommendations were developed in consultation with the Alliance’s Service Provider Commission and various constituency groups consisting of people working on the front lines of ending homelessness.

**Definitions: Chronically Homeless (§579.3)**

As with all HEARTH Act regulations, providers appreciate the significant guidance from HUD in order to appropriately implement programming and screen for adequate eligibility. With regard to the definition of “chronically homeless”, the Alliance supports the inclusion of the provision that “[s]tays in institutions of 90 days or less will not constitute a break in homelessness, but rather such stays are included in the cumulative total”. It is the opinion of the Alliance that this accurately reflects the propensity of individuals experiencing homelessness to cycle in and out of institutions due to a variety of health, substance use, and other housing stability barriers.

With regard to the proposed definition of “homeless occasion” in paragraph (1)(ii), the Alliance supports the proposed stipulation that a homeless occasion be “at least four separate occasions in the last 3 years, where the cumulative total of the four occasions is at least one year”. However, in order to ensure that documentation requirements do not become a barrier to housing, the Alliance recommends that HUD reinforce self-certification of homelessness as a valid form of homelessness verification in par with second-party verification. The Alliance asserts that the prioritization of third and second-party verification by the HEARTH Act complicates providers’ ability to accurately document days of homelessness over several occasions and places an overwhelming burden on homeless households to either maintain or obtain such documentation, which is frequently challenging due to various housing stability barriers and the transient nature of homelessness. Additionally, the Alliance has received provider feedback regarding objections about homelessness documentation during HUD monitoring visits due to the ambiguity of self-certification record keeping requirements. The Alliance recommends that HUD provide further guidance for providers on how to accurately document self-certification in order to ensure project compliance and the appropriate use of homeless services resources.

Thank you for considering our comments. If you would like to discuss these recommendations further, please contact:

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