HMIS Guidance: Permanent Housing to Permanent Housing Transfers

"My client is switching units, what should I do?"

This guidance is effective October 1, 2019 (further updated January 7, 2020), and is intended to assist agencies in remaining compliant with updated data standards while best-serving clients in meeting their housing needs. This Snohomish County HMIS guidance and the following scenarios are based on the HUD CoC Program HMIS Manual (pp. 13-14) available here:
https://files.hudexchange.info/resources/documents/CoC-Program-HMIS-Manual.pdf

A client may change units for any number of reasons including:

- a desire to live in a different neighborhood (if in a scattered site project);
- the current unit is undergoing maintenance and is uninhabitable;
- the unit fails inspection and is not being remediated;
- the client's lease was terminated but they remain eligible for assistance.

Under previous guidance, if a client was enrolled in a permanent housing program and had to vacate a leased unit, the HMIS project enrollment would remain open, without a gap, while a new unit was located. Effective October 1, 2019, some types of unit changes will require the client be exited in HMIS and re-enrolled. See the scenarios below for guidance.

Note: agencies must document continued eligibility for monitoring purposes. This agency documentation shall act as a backup to explain the apparent discrepancy in the HMIS record for Annual Performance Report (APR) purposes and local administrative inquiry. Below are common scenarios and the appropriate actions in Snohomish County's HMIS.

SCENARIO A: Client lost their unit, kept their voucher, and will be literally homeless on the streets or in the shelter until leased up in a new unit somewhere.

HMIS Action: Under the new guidance, the client needs to be exited to homelessness, with a correct exit reason. This destination is likely a 'place not meant for human habitation' or an 'emergency shelter.'

Exit Date:*	10/01/2019
Destination:*	Emergency shelter, including hotel or motel
Exit Reason:	Non-Pay of Rent/Occupancy change ▼

Immediately re-enroll the client in the correct (same) program, ClientTrack may require a one day gap. When a new unit is occupied, update the move in date in the new enrollment from NULL to the correct date. In the enrollment workflow, correctly report that they are re-entering from literal homelessness as well as the time spent unhoused in that situation. Document the reason for the gap in housing in an HMIS Case Note that is printed and added to the client's paper file.

Prior Living Situtation:*	Emergency shelter, including hotel or motel
Length of stay in the prior living situation:*	Two to six nights
Approximate date homelessness started:*	10/01/2019

SCENARIO B: Client lost their unit, kept their voucher, and will be sleeping on a friend's couch (or other temporary housing situation) until leased up in a new unit.

HMIS Action: (HUD's updated guidance, effective January 2020) **DO NOT EXIT**. Document what has occurred in the paper file.

SCENARIO C: Client must vacate their unit, but is keeping their voucher, and will be immediately moving to a new unit.

HMIS Action: As there is no gap in housing, no action needs to be taken in HMIS. **DO NOT EXIT**, but document the reason for apartment transfer in an HMIS Case Note that is printed and added to the client's paper file. Potential reasons might be due to maintenance, a change in household composition, reasonable accommodation, or similar.
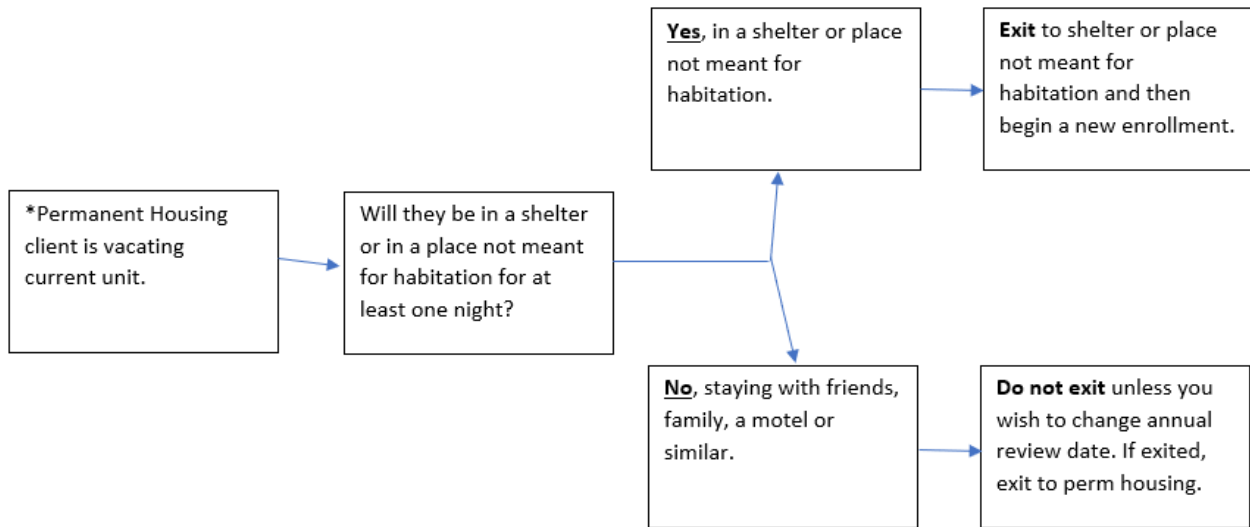
Why you may want to exit? Exiting and re-enrolling changes the client's annual review date. Additionally it is an exit to permanent housing.

Why is this change happening? HUD recognizes that clients may choose or may be forced to move while enrolled in programs. The data standards do not allow for a move-out date. To more accurately track the total number of people in housing at any one time, HUD is now requiring exits in HMIS when there is a gap in housing, if the client becomes homeless.