



# When Homelessness Becomes Rare, Brief, and Non-Recurring: Clarifying the Federal Criteria and Benchmarks

By Marcy Thompson, HUD; Keith Harris, VA; and Richard Cho, USICH

On October 1, 2015, USICH, HUD, and VA released revised criteria for determining whether or not a community has achieved an end to Veteran homelessness. The updated criteria were accompanied by new benchmarks designed to measure whether or not a community has reached the goal. We held a webinar on October 29, 2015 to walk through these criteria and benchmarks, and posted the recording and responses to the questions we received on our website.

Since holding the webinar, we've had the opportunity to help communities and stakeholders from around the country apply the criteria and benchmarks locally. Those discussions identified points where additional clarification may be needed:

## **1. The whole of its parts: The criteria and benchmarks must be examined together, not individually.**

The criteria and benchmarks work together to provide a complete picture of a community's response to Veteran homelessness. While the criteria focus on a description of the community's response, the benchmarks serve as indicators of whether that system is working. For example, Criteria Four requires that a community has the capacity to swiftly move homeless Veterans into permanent housing. Benchmark B examines the total length of time it takes, on average, for homeless Veterans to move to permanent housing from the point of identification.

It's not unlike going to your doctor for an annual exam. She asks you whether you feel good and whether there are any problems, but she doesn't stop there. She also takes your weight, checks vital signs, listens to your breathing, conducts a complete blood count, exams your head and neck, and so on in order to get a complete picture of your health. No one check or test tells you whether you are healthy or not, but together they provide a picture of your overall health. So it is with the criteria and benchmarks, which provide a picture of whether your community's system is working to ensure that Veteran homelessness is rare, brief, and non-recurring.

For example, a community cannot claim an end to Veteran homelessness if there are still many Veterans experiencing chronic homelessness, even if they are able to rapidly house most other Veterans. Nor can a community claim an end to Veteran homelessness if they will not be able to continue to meet the criteria and benchmarks in the future. And they won't have ended Veteran homelessness if the majority of Veterans are moved into transitional housing prior to permanent housing entry.

## **2. It's not one and done: The criteria and benchmarks are intended to be used as an ongoing assessment.**

An end to Veteran homelessness is something that must be maintained through an ongoing system of response to homelessness and housing crises for any and all Veterans. Reaching that goal is not about crossing a finish line of a race, but about building up and maintaining a level of performance. And the only way for a community to know if that level of performance has been achieved is if a community continues to assess it. The criteria and benchmarks are not meant to be a “one and done” test, but something that communities should continue to measure themselves against, ideally at least every 90 days permanently.

Viewing these criteria and benchmarks as a one-time test could lead to some unintended consequences. For example, a community could technically meet Benchmark B, which measures how quickly Veterans are helped to obtain permanent housing, by focusing attention on those who recently became homeless to counteract the total length of time homeless of those with longer homeless histories. In reality, this “offset” would only work for a limited period of time and not on an ongoing basis. It would also significantly limit the community’s ability to achieve Benchmark A, which measures whether chronic homelessness among Veterans has been ended.

When communities seek federal confirmation that they have achieved the criteria and benchmarks, we closely consider whether communities can sustain their achievement and how they will monitor this in an ongoing way, at least every 90 days.

## **3. Exceptions are not exclusions.**

Communities often ask us to explain the exceptions that are included in Benchmarks A and B. So what are these exceptions really about? They reflect the view that, in assessing the effectiveness of a system at the community level, we must take into consideration the reality of human experience, needs, and choice. Simply put, we didn’t want to create system-level measures that resulted in unintended negative consequences where individual choice or life circumstances were ignored. The exceptions included for Benchmark A and Benchmark B were included specifically to take this concept of personal choice into account. We were concerned that had we not made these exceptions, communities might feel pressured into coercing individuals to do things against their will in an effort to meet the criteria and benchmarks.

As anyone who has worked with people experiencing homelessness knows, there are some people whose negative or traumatic life experiences have led them to become fearful of service providers or ambivalent about changing their daily routines. It may take multiple attempts and creative engagement strategies to help some of these individuals overcome ambivalence and accept offers of permanent housing. We chose to provide an exception for the small number of chronically homeless Veterans that are hesitant about accepting assistance, but only if the community can demonstrate that it makes repeated attempts to engage each Veteran and offer permanent housing assistance. Further, the offer of permanent housing assistance must be an actual offer based on real time availability—not the promise of a particular intervention in the future.

We also made an exception for Veterans who have been offered an available permanent housing intervention (e.g., subsidy or rental assistance) but have chosen to enter service-intensive transitional housing in order to achieve sobriety and recovery or other personal goals prior to entering permanent housing. However, we expect that number to be small, as reflected in Benchmark D (i.e., ensuring that

the community is committed to Housing First and provides service-intensive transitional housing to Veterans only in limited instances). Veterans that choose service-intensive transitional housing who were not first offered a permanent housing intervention—either because there was no availability or the Veteran does not meet eligibility requirements for the permanent housing intervention options currently offered in the community—are not excluded from the calculation for Benchmark B (i.e., the length of time to entry to permanent housing). Again, we believe based on evidence and experience that when given the option between a permanent housing intervention, such as HUD-VASH and service-intensive transitional housing, the number of Veterans who choose the latter prior to accepting permanent housing is small.

#### **4. Not just offers: Benchmarks measure permanent housing entry.**

Ending chronic homelessness among Veterans means all Veterans experiencing chronic homelessness, with the possibility of a few small exceptions, have actually obtained permanent housing. A community that has only offered permanent housing to Veterans experiencing chronic homelessness will not have met this benchmark.

However, we recognize that even communities that have housed all Veterans currently known to be experiencing chronic homelessness may newly identify others over time. To account for this reality, we exempt those Veterans experiencing chronic homelessness who have been offered but not yet entered permanent housing (Exempted Group #2). Note that this group is only exempt for 90 days from the point of identification. After 90 days, these Veterans are no longer exempt and will be counted for the purposes of Benchmark A (i.e., ensuring that chronic homelessness has been ended among Veterans). In other words, this exemption isn't meant to be a "free pass" for all those who have accepted a permanent housing intervention but not yet moved into permanent housing. This exception was added to account for the situation where a community has housed all Veterans identified as chronically homeless, but where the community encounters a Veteran experiencing chronic homelessness not previously identified by the community, a Veteran who has newly become chronically homeless, or who recently relocated from another community. In this case, we needed to ensure that the community could still maintain an end to chronic homelessness among Veterans if such a Veteran was identified so long as the community could provide them with permanent housing within 90 days from the point of identification.

If a community seeking federal confirmation has many Veterans identified as chronically homeless who are expected to enter permanent housing within 90 days from the point of identification, we recommend that the community wait until the majority of these have moved into permanent housing before submitting a claim.

#### **5. Benchmark B: A community-wide average, not a program-by-program absolute.**

An important clarification is that Benchmark B does not function as a cap for every program within a community, but instead measures the community-wide average length of time it takes for Veterans to enter permanent housing from the point of identification. Benchmark B recognizes that some Veterans will exit to a permanent housing destination in a matter of days or weeks, while for others, it may take longer for the appropriate permanent housing opportunity to be arranged. This is consistent with HUD's movement to system-wide performance measures that go beyond looking at how individual projects are doing, but instead hold the entire system accountable for each of its parts.

We also do not want communities to see 90 days as the “ideal” length of time it should take for a homeless Veteran to be permanently housed. Although the benchmark is using 90 days as the average, communities should strive to shorten the length of time it takes from identification to permanent housing entry as much as possible. Benchmark B is not just measuring exits to permanent housing interventions but, instead, all permanent housing destinations, including those where Veterans obtained permanent housing without a housing intervention.

We hope that these clarifications are helpful in increasing a full understanding of the criteria and benchmarks. We have been learning a great deal as we have worked with communities to understand their progress and achievements. We expect to continue to learn and think further, to provide future clarifications as questions arise, and to review and evaluate the effectiveness of these criteria and benchmarks over time. In addition, we are happy to provide any further clarification or responses to [questions from communities](#).