



2021 Targeted Client File Review Tool

This tool contains the questions that will be evaluated during the Targeted Client File Review. These questions will be completed for participants from each of the agency's HUD CoC-Funded projects. Section B regarding Chronic Homeless Documentation is only applicable to PSH projects; the other sections are applicable to all projects. Each question indicates the procedures used by All Chicago to select which files to evaluate. Different files may be selected to evaluate different questions. Each section will receive a "concern level" of zero concern, low concern, medium concern, or high concern. The criteria for determining the concern rating is included at the end of each section.

A) Homeless Documentation

1. Does the file contain adequate documentation of homelessness that covers the participant's time of entry into the program?

Applicability: All project types and all participants; each participant will fall into a specific category (i.-vi.) according to their individual situation.

Selection of Files: Participants who enrolled in the program in 2020 or 2021. When this is not possible, files will be chosen according to those that are the most recent.

- i. For program participants who qualified because their primary nighttime residence was 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, or because they were living in a supervised shelter designed to provide temporary living arrangements, does the file include one of the following forms of documentation?
 - a. HMIS record(s) or comparable database
 - b. Written referral by another housing or service provider
 - c. Written physical observations of where the individual was or is currently living by staff and written record of reasonable efforts to obtain HMIS record or written referral
 - d. Certification by the individual or head of household seeking assistance and written record of reasonable efforts to obtain HMIS record or written referral

Possible reasons for "no": File lacks acceptable form of homeless documentation; participant doesn't meet homeless eligibility criteria; homeless documentation does not cover the time of entry into the program; homeless eligibility information in HMIS conflicted with information in the file; conflicting information about the participant's eligibility is found in different parts of the file; it is unclear from the homeless documentation what eligibility criteria the participant met; self-certification is not signed.

- ii. For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less, and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, does a review of program participant files confirm that they were in the institution 90 days or less as evidenced by:
- discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution, or
 - a written record of the intake worker's due diligence in attempting to obtain the information above and a written certification by the individual seeking assistance that stated he or she is exiting (or has just exited) the institution where he or she resided for 90 days or less?

Possible reasons for "no": File lacks documentation of institutional stay; Documentation indicates the participant resided in the institution 90 days or more; Documentation does not cover time period immediately prior to enrollment in the program; Documentation does not clearly support that the participant resided in an institution.

- iii. For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, does a review of program participant files confirm that the program participant resided in a shelter or place not meant for human habitation immediately prior to entering the institution, as evidenced by:
- a written referral by another housing or service provider;
 - a printed record from HMIS or a comparable database used by victim service providers or legal service providers;
 - a written observation by an outreach worker of the conditions where the individual or family was living; or
 - written certification by the individual or head of household seeking assistance?

Possible reasons for "no": File lacks documentation of participant's homeless eligibility prior to institutional stay; Documentation does not demonstrate the participant experienced literal homelessness immediately prior to the institutional stay; Documentation does not cover the time period immediately preceding the institutional stay

- iv. Where the program participant qualified under paragraph (4) of the definition of homeless and was served by a victim service provider, do the records show that either the program participant or the intake worker certified in writing that the individual or head of household made an oral statement that the program participant:
- was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault or stalking, or other dangerous or life-threatening conditions that relate to violence;
 - lacked the resources or support networks necessary to obtain other permanent housing; and
 - had not identified other subsequent residence?



Possible reasons for “no”: Neither program participant or intake worker certified the head of household’s oral statement in writing; The certified oral statement does not meet the specified criteria; Participant was required to obtain unnecessary documentation to support their domestic violence status.

- v. Where the program participant qualified under paragraph (4) of the definition of homeless and was served by an organization that is not a victim service provider, do the records contain the required documentation and support for the program participant’s oral statement that the program participant or family:
- was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault or stalking, or other dangerous or life-threatening conditions that relate to violence;
 - lacked the resources or support networks necessary to obtain other permanent housing; and
 - had not identified other subsequent residence?

Additionally, does the documentation of the program participant’s oral statement include:

- a written certification by the head of household that the statement is true and complete; and
- a written observation of the intake worker or a written referral by a housing or service provider, legal assistance provider, social worker, health care provider, law enforcement agency, pastoral counselor, or any other organization from whom the program participant had sought assistance for domestic violence, dating violence, sexual assault, or stalking. (This written referral or observation need only include the minimum amount of information required to document that the individual or family is fleeing domestic violence, dating violence, sexual assault or stalking and is not required if obtaining or maintaining this information would have jeopardized the program participant’s health or safety).

Possible reasons for “no”: Neither program participant or intake worker certified the head of household’s oral statement in writing; The certified oral statement does not meet the specified criteria; Participant was required to obtain unnecessary documentation to support their domestic violence status; the documentation does not include written certification that the statement is true and complete; the documentation does not include a written observation or written referral

- vi. Where the program participant qualified under category 2 imminent risk of homelessness, do the records contain documentation of the following:
- Documentation that housing will be lost within 14 days, including any of the following: 1) notice of eviction or equivalent legal document, or 2) proof of inability to continue to pay for hotel or motel, or 3) statement by youth that they cannot continue to stay at the place they have been AND written or oral verification from owner or renter of housing obtained by intake worker OR documentation of intake worker’s attempts to verify information.
 - Documentation that the participant has no safe alternative housing, no financial or other resources, and no family or other support networks. This can be self-certified.



Possible reasons for “no”: File lacks documentation that housing will be lost; Documentation that the participant has no safe alternative and no other resources or support networks is missing; Documentation indicates the participant is not at imminent risk of homelessness; Documentation does not cover time period immediately prior to enrollment in the program.

Results for A) Homeless Documentation

Condition	# Files
a. Documentation is present but insufficient.	
b. No homeless documentation in the file.	
c. Participant does not meet homeless eligibility criteria for the program model type.	

Determining the Concern Level:

- Zero Concern: all files met requirements
- Low Concern: any number of files in category a
- Medium Concern: 1 or 2 files in categories b or c
- High Concern: 3 or more files in categories b or c

Concern Level: _____

Do the files demonstrate practices that are consistent with the policies/procedures the agency submitted in the 2019 Intent to Renew (ITR)? _____

B) Chronic Homeless Documentation

2. Where chronic homelessness is required for entry into a project (e.g., Permanent Supportive Housing), does a review of program participant files confirm that there is acceptable evidence of the qualifying household’s chronic homeless status at time of entry and that the recipient complied with the Chicago CoC Chronic Homelessness Verification Packet?

Applicability: PSH projects; participants who entered after the project’s 2017 grant start date.

Selection of Files: Participants who enrolled in the program in 2020 or 2021. When this is not possible, files will be chosen according to those that are the most recent but no earlier than the project’s 2017 grant start date.

Possible reasons for “no”: Participant does not meet the chronic homeless definition; Chronic Homelessness Verification Packet was not completed; Chronic Homelessness Verification Packet was not completed correctly; Disability documentation insufficient; homeless status documentation insufficient; length of homelessness documentation insufficient.

Results for B) Chronic Homeless Documentation

Condition	# Files
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a. Insufficient documentation of one factor (disability, homeless status at entry, or length of time homeless).	
b. Insufficient documentation of two factors (disability, homeless status at entry, or length of time homeless).	
c. Insufficient documentation of three factors (disability, homeless status at entry, and length of time homeless).	
d. Verification was found in the file that demonstrates the participant was not chronically homeless.	

Determining the Concern Level:

Zero Concerns: all files met requirements

Low Concern: any number of files in categories a or b

Medium Concern: 1 or 2 files in categories c or d

High Concern: 3 or more files in categories c or d

Concern Level: _____

Do the files demonstrate practices that are consistent with the policies/procedures the agency submitted in the 2019 Intent to Renew (ITR)? _____

C) Exits

The following applies to questions 3-6:

Applicability: All project types; participants who have exited the program, voluntarily or involuntarily.

Selection of Files: Participants who exited the program in 2020 or 2021. When this is not possible, files will be chosen according to those that exited most recently.

3. Does a review of program participant files confirm that there is acceptable evidence that the recipient or its subrecipients provide participants with a clear reason for termination?

Possible reasons for “no”: Documentation that participant received written reason for termination not included in the file.

4. Does a review of program participant files confirm that there is acceptable evidence that the recipient or its subrecipients explain and provide participants with a due process for termination?

Possible reasons for “no”: Documentation that participant received due process when informed of termination not included in the file.

5. Does a review of program participant files confirm that there is acceptable evidence that the recipient or its subrecipients document evidence of the participant’s exit destination?



Possible reasons for “no”: Documentation of exit destination missing from file; documentation in file is unclear what type of destination it is; File lacks third party documentation, such as a lease, or attempt; Unclear whether destination documentation was requested

- 6. Does a review of program participant files confirm that there is acceptable evidence that the recipient or its subrecipients follow a Housing First approach by not terminating the participant for any of the following reasons: failure to participate in supportive services, failure to make progress on a service plan, loss of income or failure to improve income, active or history of substance abuse, having a mental health condition, having a physical or developmental disability, having a rental or eviction history, being too young or too old, having a criminal record with exceptions for mandated restrictions, being a victim of domestic violence, or any other activity not covered in a typical lease agreement?

Possible reasons for “no”: Documentation in the file indicates a housing first approach was not followed.

Results for C) Exits

Condition	# Files
a. File lacks documentation that the program provided the participant with a clear reason for termination.	
b. File lacks documentation that the program provided the participant with a due process for termination.	
c. File lacks evidence that the program documented or attempted to document the participant’s exit destination.	
d. Reason for termination does not align with housing first.	

Determining the Concern Level:

Zero Concern: all files met requirements

Low Concern: any number of files in categories a, b, or c

Medium Concern: 1 file in category d

High Concern: 2 or more files in category d

Concern Level: _____

Do the files demonstrate practices that are consistent with the policies/procedures the agency submitted in the 2019 Intent to Renew (ITR)? _____



D) Individual Service Plans (ISPs)

- 7. Does a review of program participant files confirm that there is acceptable evidence that the recipient or its subrecipients complete an initial Individual Service Plan (ISP) developed by the participant and Case Manager that includes goals and timeline for completion?

Applicability: All project types; all participants.

Selection of Files: Participants who enrolled in the program in 2020 or 2021. When this is not possible, files will be chosen according to those that are the most recent.

Possible reasons for “no”: ISP missing from file; goals are not specific; goals are not individual; goals are not easily understood; minimal goals are listed; ISP does not include due dates/timelines; it is unclear what is the role of the case manager versus the participant; it is unclear if the participant contributed to the creation of the ISP.

Results for D) Individual Service Plans

Condition	# Files
a. ISPs are regularly missing client or staff signatures and/or dates.	
b. ISP goals do not include timelines for completion.	
c. ISPs are not completed/updated at the expected intervals (according to the standard stated in the program’s 2019 ITR submission).	
d. ISP goals are not individualized.	
e. No ISP in the file.	

Determining the Concern Level:

Zero Concern: all files met requirements

Low Concern: any number of files in categories a or b; or, less than 50% of files in categories c or d

Medium Concern: 1 file in category e; or, greater or equal to 50% of files in categories c or d

High Concern: 2 or more files in category e

Concern Level: _____

Do the files demonstrate practices that are consistent with the policies/procedures the agency submitted in the 2019 Intent to Renew (ITR)? _____

E) HMIS

- 8. Does the project start date found on records in the file match the project start date in HMIS?

Applicability: All project types; all participants.

Selection of Files: Same files as those reviewed in questions 1 & 2.



Possible reasons for “no”: Start date in HMIS does not match any of the following: the initial intake form, the acceptance of rule/regulations for the program, or a client consent form.

9. Do the HMIS records and participant files demonstrate that the agency accurately entered the participant’s prior living situation?

Applicability: All project types; all participants.

Selection of Files: Same files as those reviewed in questions 1 & 2.

Possible reasons for “no”: The participant’s prior living situation in HMIS does not match information in their homelessness history packet, intake packet, or homelessness documentation.

10. Do the HMIS records and participant files demonstrate that the agency accurately entered the move-in date?

Applicability: PSH and RRH projects; all participants within those projects.

Selection of Files: Same files as those reviewed in questions 1 & 2.

Possible reasons for “no”: The participant’s move-in date in HMIS does not match with the lease date or a designated amount of time since the lease date; a move-in date was not entered.

11. Do the HMIS records and participant files demonstrate that the agency accurately entered the participants consent forms?

Applicability: All project types; all participants.

Selection of Files: Same files as those reviewed in questions 1 & 2.

Possible reasons for “no”: ROI (or supplemental) in the file is not entered in HMIS, ROI (or supplemental) entered in HMIS is not present in the file, ROI or supplemental is incomplete, ROI or supplemental does not have the necessary signatures, data entered in HMIS does not reflect the information documented in the ROI or supplemental found in the file, outdated version of the ROI or supplemental

Results for E) HMIS

Condition	# Files
a. Dates in HMIS and in corresponding files are different.	
b. ROIs in HMIS do not have a corresponding Client Consent in the file and vice versa.	
c. Housing Move-in Dates are not entered for a participant who has a documented move-in day in the file (as applicable).	
d. No Client Consent or ROI in the record (both in file and HMIS).	
e. No Housing Move-in Date documented in HMIS and no documentation for a Housing Move-In Date in the file (as applicable).	

Determining the Concern Level:

Zero Concern: All files met requirements

Low Concern: Any number of files in category a.

Medium Concern: One or more files in categories b or c



High Concern: One or more files in categories d or e.

Concern Level: _____

Do the files demonstrate practices that are consistent with the policies/procedures the agency submitted in the 2019 Intent to Renew (ITR)? _____
