

SAMPLE - Homelessness Verification and Documentation Policy

Purpose

This policy provides the necessary information and procedures to ensure that case managers correctly and consistently verify and document the eligibility of participants in Continuum of Care-funded programs (CE, TH, RRH, PSH).

Regulatory Authority

This policy is drawn from and strives to conform to the CoC regulations found at:

- [24 CFR 578.3 “Homeless”](#)
- [24 CFR 578.103\(a\)\(3\)](#)
- [24 CFR 578.103\(c\)](#)

CoC Participant Eligibility Criteria

Within CoC regulation, at [24 CFR 578.3 “Homeless”](#), HUD recognizes four categories of homelessness. Of the four categories, two of them apply to **SUBRECIPIENT’S** CoC program participants:

- Category 1 – literal homelessness
 - sheltered, unsheltered, **or** exiting an institution
- Category 4 – fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking.

SUBRECIPIENT receives CoC funding to help implement its coordinated entry (CE), transitional housing (TH), rapid rehousing (RRH), and permanent supportive housing (PSH) programs. Each of these programs has its own participant eligibility criteria:

Coordinated Entry (CE)

- Participants must be experiencing Category 1 or 4 homelessness.

Transitional Housing (TH)

- Participants must be experiencing Category 1 or 4 homelessness.

Rapid Rehousing (RRH)

- Participants must be experiencing Category 1 or 4 homelessness.

Permanent Supportive Housing (PSH)

- Participants must:
 - have a disability
 - be experiencing Category 1 or 4 homelessness
 - meet the definition of chronically homeless.

Order of Priority for Documenting Homelessness Status

At [24 CFR 578.103\(a\)\(3\)](#), HUD recognizes three types of documentation to establish a program participant's homelessness status.

In something called *Order of Priority*, HUD prioritizes the three documentation types such that #1 is the top/first choice and that #3 is the option to pursue if #'s 1 & 2 aren't possible. The *Order of Priority* for homelessness documentation is:

1. **Third-party Documentation** (not required for DV projects)
 - a. Third-party sources documents (i.e. discharge papers or HMIS records)
 - b. Third-party written (i.e. referral letter)
 - c. Third-party oral (i.e. signed and dated notation of third party's statement)

*"Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service (DV) provider."

– 1st par. of [24 CFR 578.103\(a\)\(3\)](#)

2. **Intake Worker Observation**

3. **Client Self-certification**

*When client self-certification is necessary, case managers should document their "due diligence", meaning their efforts to obtain #1 & 2 above.

[24 CFR 578.103\(a\)\(3\)](#), which redirects to [24 CFR 576.500\(b\)\(2\)\(ii\)](#)

Procedure – Verifying and Documenting Homelessness Status

The procedure below describes **one way** in which verifying and documenting homelessness status could unfold. Given the wide variety of possible scenarios, case managers may need to reorder or slightly modify the steps described below. When reordering or modifying steps, case managers must use informed professional judgment to maintain the integrity of the procedure and to fully verify and document a client’s eligibility.

1. CoC Participant Eligibility Worksheet

At or before program/project intake, case managers must use the *CoC Participant Eligibility Worksheet* to screen the participant for eligibility.

*For PSH clients, case managers must complete the additional steps of documenting:

- a. chronic homelessness with the [Certification of Chronic Homeless Status](#)
- b. disability with the [PSH Verification of Disability Form](#)

2. Recordkeeping

Case managers must store the *CoC Participant Eligibility Worksheet* and the accompanying homelessness documentation in the participant’s paper file or upload it to the participant’s HMIS / DV ClientTrack digital files.

*Case managers must store homelessness status documentation in such a way that they can readily produce the documentation during a HUD or IHCDCA monitoring review.

** **5-year Retention Period.** “Documentation of each program participant’s qualification as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.” [24 CFR 578.103\(c\)](#)