

Title: 4.2 Documentation Policies

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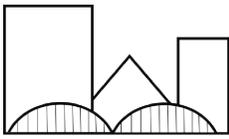
Date Approved:

This policy will outline the documentation requirements of CoC funded programs within the Coordinated Entry system. There are two main documents that are collected for participants in CoC-funded housing programs, which are Verification of Homelessness (VOH) and Verification of Disability (VOD).

- Verification of Homelessness (VOH): A VOH document is used to assess a client's literal homelessness status, and the length of time they have experienced homelessness in the last 3 years. The following are acceptable forms of VOH documentation in the priority order set by HUD in 24 CFR 578.103:
 1. An HMIS record or record from a comparable database;
 2. A written observation by an outreach worker of the conditions where the individual was living;
 3. A written referral by another housing or service provider; or
 4. Where evidence in paragraphs (a)(4)(ii)(A) through (C) of this section cannot be obtained, a certification by the individual seeking assistance, which must be accompanied by the intake worker's documentation of the living situation of the individual or family seeking assistance and the steps taken to obtain evidence listed above.
- Verification of Disability (VOD): A VOD document is used for PSH programs to verify that a client or at least one person in a household has a qualifying disability. Programs that require a VOD, such as PSH programs, may accept the following as outlined in 24 CFR Part 578.103:
 1. Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently;
 2. Written verification from the Social Security Administration;
 3. The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);

What does this mean for service providers?

While there are multiple ways to obtain a VOH or VOD, service providers should aim to gather these documents in the preferred HUD order. This ensures that the most accurate and verifiable options for VOHs/VODs are explored and/or obtained first.



4. Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence listed above;
5. Other documentation approved by HUD.

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third-party verification. Documents must be kept for a minimum of (5) years per HUD guidance. Copies of all eligible forms of verification may be found in the back of this manual and on the Community Alliance website.

Chronic Homeless Verification

The following section has been taken from the HUD Exchange page on record keeping requirements for chronically homeless persons¹:

“The Final Rule on Defining “Chronically Homeless” establishes recordkeeping requirements for the following criteria, which must be documented for the individual or head of household presenting for assistance²:

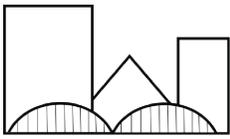
- The history of residing in a place not meant for human habitation, in an emergency shelter, or in a safe haven, including where the individual or head of household is coming from currently;
- Stays in institutions;
- Breaks of seven nights or more residing in a place *meant* for human habitation; and
- The qualifying disability.

For each of the criteria above, with the exception of documenting breaks of seven nights or more in a place meant for human habitation, the final rule requires that recipients maintain and follow written intake procedures which establish the order of priority for obtaining evidence as third-party documentation first, intake worker observation second, and written certification from the person seeking assistance third. Breaks between occasions may be documented entirely by the individual or head of household’s written certification that they resided in a place meant for human habitation, such as in the home of a friend or in a hotel paid for by the household, for at least seven consecutive nights.

The definition of chronically homeless in the final rule requires that an individual or head of household be coming directly from a place not meant for human habitation, an emergency shelter, or a safe haven and that they have been residing in one of these locations in a place not meant for human habitation, an emergency shelter, or a safe

¹HUD Exchange. (2016) What are the recordkeeping requirements that were established in the final rule on the definition of chronically homeless. Retrieved from: <https://www.hudexchange.info/faqs/2755/what-are-the-recordkeeping-requirements-that-were-established-in-the-final/>

² Department of Housing & Urban Development. (2016) Final rule on defining “chronically homeless”. Retrieved from: <https://files.hudexchange.info/resources/documents/Defining-Chronically-Homeless-Final-Rule.pdf>



haven for a period of at least twelve (12) months either continuously or cumulatively over a period of at least four (4) occasions over the last three (3) years.

In general, HUD expects recipients to document at least 9 of the 12 months the individual or head of household resided in a place not meant for human habitation (e.g., under a bridge, a car), in an emergency shelter, or in a safe haven with third-party documentation. The remaining months can be documented by the individual or head of household's own written certification that they had resided in one of these locations.

For up to 25 percent of program participants served by the project in an operating year, recipients may document up to the full 12 months through the individual or head of household's written certification of where they were living, but this must be accompanied by the intake workers notes that demonstrate that they have exercised due diligence to obtain a higher level of documentation. It should be noted that the final rule clarifies that a single encounter in a month is sufficient documentation to consider the individual or head of household as residing in that location for the entire month unless there is clear evidence of a break (such as an HMIS record of a stay in transitional housing where the household is not also enrolled in permanent supportive housing and actively seeking a unit) of more than seven nights."

What does this mean for service providers?
VOH's for chronic homelessness need to total 12 months, and in general at least 9 out of the 12 months should be documented by a HUD preferred source. The remaining 3 months can be self-certified by a client using the self-certification form.

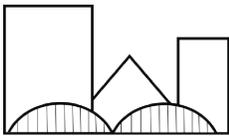
The following section has been taken from the HUD Exchange pages on the Final Rule for "Chronically Homeless"³:

"The amended definition as found in the Final Rule on Defining "Chronically Homeless" does not establish a minimum number of days that each occasion must total and instead defines the end of an occasion as a break of *at least seven nights* where the individual or head of household is not residing in an emergency shelter, safe haven, or is residing in a place meant for human habitation (e.g., with friends or family) or a period of 90 days or longer in an institution.

While third-party documentation may be available to document a break in an individual or head of household's time residing in a place not meant for human habitation, in an emergency shelter, or in a safe haven, it is not required. All breaks can be documented through a written certification of the individual or head of household seeking assistance. However, please note that when there is evidence of a break (such as in an HMIS record) it must be counted.

Stays of less than seven nights in one of these places is not considered a break and instead counted toward the total time residing in a place not meant for human

³ HUD Exchange. (2016). With regard to the final rule on the definition of chronically homeless, what constitutes an occasion of homelessness and how does HUD define a break? Retrieved from: <https://www.hudexchange.info/faqs/2752/with-regard-to-the-final-rule-on-the-definition-of-chronically-homeless/>



habitation, an emergency shelter, or a safe haven. Additionally, stays in institutions of fewer than 90 days are not considered a break and instead the time spent in the institution is counted towards the total time residing in a place not meant for human habitation, an emergency shelter, or safe haven.”

Dedicated Plus

The following is taken from the HUD Exchange page on DedicatedPlus program requirements⁴:

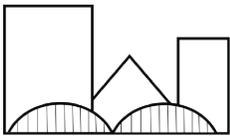
Beds that are dedicated to chronically homeless individuals and families are those beds dedicated specifically for use by chronically homeless individuals and families within a CoC's geographic area, as reported in the CoC's HIC and the previous FY Competition's permanent housing project application. When a program participant exits the project, the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing (PSH) projects. If a project is made up of 100 percent dedicated beds, this is what HUD commonly refers to as a project that is 100 percent dedicated for chronically homeless individuals and families.

Who does this apply to?
Programs that have dedicated beds for both chronically homeless individuals and families with children and identified themselves as DedicatedPlus on the most recent NOFA CoC Competition Application must adhere to these program requirements.

The DedicatedPLUS concept provides more flexibility to communities, particularly those that have already dedicated 100 percent of the PSH resources to chronic homelessness, to expand their eligibility to serve persons with long histories of homelessness and severe service needs who would not meet the definition of chronic homelessness at project entry. The DedicatedPLUS concept applies at the project level. All new PSH projects are required to either be (1) 100 percent dedicated to chronic homelessness or (2) DedicatedPLUS. Renewal PSH projects may choose to change their classification to DedicatedPLUS as part of their project application. DedicatedPLUS projects may serve individuals and families with disabilities and families, that meet the following criteria at project entry:

1. experiencing chronic homelessness as defined in 24 CFR 578.3;
2. residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. residing in a place not meant for human habitation, emergency shelter, or safe haven and had been admitted and enrolled in a permanent housing project within the last year but were unable to maintain a housing placement and met

⁴ HUD Exchange. (2019). What is the difference between beds dedicated to chronically homeless individuals and families and project applications that are identified as DedicatedPLUS? Retrieved from: <https://www.hudexchange.info/faqs/3247/can-you-explain-the-difference-between-beds-dedicated-to-chronically/>



- the definition of chronic homeless as defined by 24 CFR 578.3 prior to entering the project;
4. residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3;
 5. residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meet the definition of 'homeless individual with a disability'; or
 6. receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

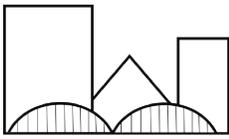
100% Dedicated

When a project is 100% dedicated, this means that all of the beds in the project are permanent supportive housing beds dedicated specifically for use by chronically homeless individuals and families within a CoC's geographic area. The following sections have been taken from the HUD Exchange page outlining policies for what a program that is dedicated for chronic homeless persons should do if no chronically homeless persons can be identified⁵:

"If there were no chronically homeless persons identified as chronically homeless at the point in time in which a program has a vacancy, it would be acceptable to serve a non-chronically homeless household in a vacant unit. At no point should beds be held vacant waiting for people to age into chronicity. Serving a non-chronically homeless household in a vacant unit would also be acceptable if there are individuals that are not ready or willing to be housed in permanent supportive housing (PSH). In both situations, however, you will need to document very carefully what attempts were made to locate persons that met the definition of chronically homeless, and what the outreach strategy was (e.g., if your community has a by-name list or prioritized list through your coordinated entry).

The CoC and recipient of PSH must maintain records to document what efforts have been made to locate persons experiencing chronic homelessness. Ideally, the CoC should have data on all households that are currently presenting for assistance within the CoC which should include whether or not the household meets the definition of chronically homeless and that is informed by a comprehensive outreach strategy. It is recommended that CoCs document what their outreach strategy consists of that recipients of CoC Program-funding are able to keep on file. To justify serving a non-chronically homeless household, that documentation should demonstrate that outreach is occurring regularly and that the CoC is making reasonable efforts to locate

⁵ HUD Exchange. (2016). How does a dedicated PSH project document the efforts they have taken to locate persons considered the highest priority when there are no chronically homeless persons in their geographic area? Retrieved from: <https://www.hudexchange.info/faqs/2754/with-regard-to-the-final-rule-on-the-definition-of-chronically-homeless-if/>



and identify all persons experiencing homelessness within the community. If there are no households that meet the definition of chronically homeless at the time in which a vacancy is available, this will serve as sufficient documentation to demonstrate that there are no identified chronically homeless households within the CoC's geographic area."

Documentation for Clients Fleeing Domestic Violence

The following record-keeping requirements for clients who are seeking housing assistance due to domestic violence are outlined by HUD and taken from the HUD Exchange resource on record keeping requirements⁶:

- For Victim Service Providers (VSPs): Documentation that an individual or head of household is experiencing homelessness can be in the form of an oral statement by the individual or head of household seeking assistance which states: they are fleeing domestic violence; they have no subsequent residence; and they lack resources. This statement must be documented by a self-certification or a certification by the intake worker.
- For non-VSPs: Documentation that an individual or head of household is experiencing homelessness can be provided in an oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworkers. Where the safety of the individual or family is not jeopardized, the oral statement must be verified and:
 - Certification by the individual or head of household that no subsequent residence has been identified; and
 - Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing

⁶ HUD Exchange. (n.d.) Criteria and recordkeeping requirements for definition of homeless. Retrieved from: https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf