Documenting Homelessness

San Diego Continuum of Care
Why are we here?

- Inconsistent collection of homeless documentation
- Understand HUD’s expectations
- Collaborate with other agencies to address HUD requirements for documentation
Hearth Act - Homeless Status Priority Order

• Category 1: Literally Homeless
• Category 2: Imminent Risk of Homelessness
• Category 3: Homeless Under Other Federal Statutes
• Category 4: Fleeing domestic violence

**Note:** Always document most severe category for those with multiple conditions.
Category 1 – Literally Homeless

• Unsheltered Homeless
• In Shelter
  – Emergency shelter
  – Transitional housing program for homeless people
  – Hotel/motel paid by charitable organization or government program
•Exiting an Institution
  – Must have been there less than 90 days AND
  – Resided in emergency shelter or unsheltered before
Category 2 – Imminent Risk of Homelessness

- Housing to be lost within 14 days AND
- No subsequent housing options AND
- No other resources and support networks
Category 3 – Homeless Under Other Federal Statutes

- Homeless Under Another Federal Statute
- No Lease, Ownership or Occupancy Agreement in Permanent Housing During Past 60 days.
Category 3 – Homeless
Under Other Federal Statutes:
Unaccompanied youths under 25 years of age or families with children
Category 3 – Homeless Under Other Federal Statutes

• Defined as homeless under one of seven enumerated federal statutes; AND

• No lease, ownership interest or occupancy agreement in permanent housing at any time during the previous 6 months; AND

• Persistent housing instability; AND

• Expected to remain homeless in immediate future due to special needs or barriers to jobs
Category 3 – Homeless Under Other Federal Statutes

- Section 387 of the Runaway and Homeless Act
- Section 637 of Head Start Act
- Section 41403 of Violence Against Women Act
- Section 330 (h) of Public Health Service Act
- Section 3 of Food and Nutrition Act of 2008
- Section 17(b) of Child Nutrition Act
- Section 725 of McKinney-Vento

**NOTE:** Document how a client meets this reg.
Category 4 – Domestic Violence

• Fleeing or attempting to flee domestic violence, sexual assault, stalking or other life-threatening conditions
• No other residence
• Lack of resources or support networks.

• NOTE: There are some differences between victim and non-victim providers. Check reg.
Definition of Disability

Conditions that:

– Is expected to be long-continuing/indefinite duration; and
– Impedes ability to live independently; and
– Could improve w/ suitable housing; and
– Is physical/mental/emotional impairment, including alcohol/drug abuse, PTS disorder or brain injury.

Also includes developmental disability and AIDS
• Require homelessness documentation at intake.

• Maintain and follow written intake procedures to ensure compliance with homelessness definition.
Order of priority

- Third party documentation; OR
- Intake worker observation; OR
- Self-certification.

Note: HMIS or comparable data can meet third party documentation.
• **Note:** Lack of documentation must not prevent:
  – Individual or family from immediately being admitted to a shelter or receiving services.
  – Victims of domestic violence seeking shelter.
Third party documentation

- Source documents; OR
- Written verification; OR
- Oral verification
Third Party documentation
Source Documents

• Pre-existing records
  – Discharge paperwork from hospitals
  – Paycheck stubs
  – Unemployment compensation statements
  – Public benefit statements
  – Bank statements

HMIS printout of stay records can be used.
Third Party Documentation

Written Verification

• Statement from a relevant third party (email statement-OK)
  – Letter from employer specifying wages and hours
  – Letter from host families: no longer permitted to stay.
  – May be on standardized forms to ensure consistency and completeness
  – Written referrals from appropriate agency (outreach provider, law enforcement or emergency medical service)
Third Party Documentation

Oral Verification

• From a relevant third party
  – Over phone or in person from appropriate entity such as outreach provider, local law enforcement or emergency medical service.
  – Intake staff must document verification in file.
Third Party Documentation

Exceptions

• Emergency shelters may rely on self certs
• Street outreach clients do not require third party documentation
• Persons fleeing domestic violence, etc.
• Provide oral statement that there is no other place to go or lack resources or support networks.
Third Party Certification
Due Diligence

• Agency must make a conscientious and reasonable effort to obtain third party verification.

• Agency must document their efforts including reasons that prevented them from obtaining third party verification.
Third Party Certification Due Diligence Documentation

• Description of efforts to contract a third party (such as phone call logs, email correspondence, certified letters)

• Description of outcome including obstacles encountered

• Signed and dated by intake staff as true and complete.
Documentation must include the following:

- Name of person or family seeking assistance
- Entity or party providing verification
- Sufficient detail re: specific condition/criteria being documented
Third Party Certification
Additional Documentation

• Must be on third party letterhead etc. (May be an email; provided that, it is from organizational but not private email account.

• Signed and dated by third party rep.

• Additional relevant information
Intake Worker Observation

- Identifies the worker making the observation
- Signed and dated certification by intake staff
Self Certification

- Name of the certifier
- Signed and dated by certifier
- If self certification must be verified:
  - Confirmation that certification was verified by intake staff;
  - Documented due diligence and signed and dated by intake staff.