

# Documenting Homeless Eligibility and Recordkeeping Guide

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# Introduction

# **Purpose of Document**

The purpose of this document is to guide program staff in determining and documenting eligibility for HUD assisted homeless projects to ensure compliance with <u>HUD's homeless definition</u>. For this document, guidance will be specific to CoC program recordkeeping requirements under the CoC Program Interim Rule (<u>24 CFR 578</u>) and will reference additional HUD guidance provided via HUD FAQs and the HUD Exchange. For other HUD assisted homeless projects please refer to guidance provided under the <u>HUD Exchange</u> for your specific HUD program (e.g., ESG) as there may be some variation in eligibility and/or recordkeeping requirements.

# **HUD Training and Resources**

# **HUD Training**

All program staff should complete HUD's online training module to help staff understand HUD requirements for documenting the homeless status of households seeking assistance in projects funded through the Continuum of Care (CoC) and Emergency Solution Grants (ESG) Programs. You must have a HUD Exchange account to take this training. Additional training links can be found below for programs dedicated to serving chronically homeless households.

- Recording and Documenting Homeless Status Training
- Defining "Chronically Homeless" Final Rule Webinar and Q and A
- Using HMIS to Document a Client's Chronic Homeless Status for Eligibility Purposes

# CoC and ESG Virtual Binders and Other Resources

- Homeless Eligibility (PDF)
- Chronic Homelessness Status (PDF)
- HEARTH "Homeless" Definition Final Rule (PDF)
- Defining Chronically Homeless Final Rule (PDF)
- Flowchart of HUD's Definition of Chronic Homelessness
- HUD's Homeless Definition as it Relates to Children and Youth
- Creating Access for Survivors: Category 4 HEARTH Homeless Designation
- Overview of DedicatedPLUS: Eligibility and Recordkeeping Requirements
- Who can certify a client's disability in the state of CA?



# HUD CoC FAQs regarding Homeless Status Recordkeeping

<u>FAQ ID:2753</u> Can an individual or head of household be considered chronically homeless if they are coming directly from an institution? Why or why not?

<u>FAQ ID: 2757</u> How can a record from HMIS or a comparable database count as documentation of homelessness?

<u>FAQ ID: 2758</u> How can encounters with the individual or head of household by the outreach worker or intake worker be documented so that it is considered third-party documentation?

<u>FAQ ID: 2759</u> Can a community member, such as a shopkeeper or neighborhood resident, verify homelessness?

<u>FAQ ID: 2760</u> Can housing or service providers such as emergency shelter staff, members of law enforcement, or healthcare professionals verify homelessness?

<u>FAQ ID: 2762</u> How can recipients and subrecipients document stay in institutions of fewer than 90 days with regard to the recordkeeping requirements that were established in the final rule on the definition of chronically homeless?

<u>FAQ ID: 2872</u>- For many persons experiencing chronic homelessness, obtaining required third-party documentation can take a long period of time. Are recipients of PSH required to have all third-party documentation at the point of intake and enrollment of a program participant into a project?

<u>FAQ ID 530</u> - Is an individual or family that is receiving Rapid Re-Housing Assistance considered chronically homeless for purposes of remaining eligible for permanent housing placements dedicated to serving the chronically homeless?

<u>FAQ ID 1914</u> - What are the data collection and reporting requirements for a program participant that is enrolled in a PSH project, but is residing in a transitional housing project until a unit can be found?

# Additional Guidance

### **Homeless Status**

When using an HMIS record as third-party evidence only a single record of stay in an emergency shelter, safe haven, transitional housing program, or an outreach contact of an individual or head of household residing in a place not meant for human habitation in a single month is sufficient third-party 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 an exit to permanent housing.

For an HMIS record that includes enrollments in the following project types, the following documentation guidance is provided to ensure proper recordkeeping and to qualify as third-party documentation.

• Safe Parking and Safe Sleeping Programs- Based on our local HMIS project implementation of Safe Parking and Safe Sleeping programs as Support Services Only (SSO) projects, HUD has confirmed the HMIS program record is not sufficient to show an individual or household was living in a place not meant for human habitation. Intake staff can obtain third-party verification through written observations by an outreach worker, intake worker, or by a community member that includes a description of the living conditions where the individual or household was living or currently living. Documentation requirements must align with documentation standards for documenting unsheltered homelessness.

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• YHDP Host Homes — Per the HMIS Data Standards there is a distinction between Host Homes with homeless criteria and Host Homes (non-crisis). Host Homes with homeless criteria fall under the emergency shelter subcategory. Based on our local HMIS project implementation for YHDP Host Homes projects (SSO), a YHDP Host Home HMIS Record will not qualify as third-party source documentation. YHDP Host Home providers must provide written documentation of "host home shelter" services via the third-party verification form (check box for emergency shelter) or a signed letter on agency letterhead from the YHDP host home provider.

### Disability Status

Disability verification is only required at the participant's project entry into PSH and does not need to be recertified for the person to continue receiving assistance (Verification can also be obtained while an individual is enrolled in RRH as a bridge to PSH. PSH Recipients and subrecipients have 45 days to obtain documentation of disability at project entry into PSH as long as there is intake staff-recorded observation that a disability is present. A disability may never be documented based on oral third-party reports or self-certification by the potential program participant. To help expedite movement to permanent housing, outreach staff (for example) can use their observation of a homeless individual's disability as an interim form of documentation until documentation from a licensed professional or other approved disability documentation is obtained.

# **Homeless Eligibility by Project Type**

Under the CoC Program, the following CoC funded projects can serve individuals or families under the following HUD Categories:

### **Permanent Support Housing**

• May serve an individual or household where one family member has met <u>HUD's Chronically Homeless</u> <u>Definition</u> or has met eligibility criteria as defined under <u>DedicatedPLUS</u>.

### **Rapid Rehousing and Joint TH-RRH**

 May serve an individual or household under Category 1, 2, and 4 (Note: Criteria may be different for other RRH programs such as ESG RRH).

### **Transitional Housing (Standalone)**

May serve an individual or household under Category 1, 2, and 4.

# **YHDP Replacement SSO Projects**

May serve an individual or household (24 and under) under Category 1, 2, and 4.

### **Safe Havens**

• May only serve *literally homeless* individuals (as defined in the CoC Program Interim Rule in paragraph 1 (i) and 1(iii) who reside on the streets or place not meant for human habitation and who have severe and persistent mental illness.



*Note:* Confirming homeless status eligibility does not guarantee an individual or family qualifies for homeless services. All program criteria must be met as outlined in the program's application and scope of work (subpopulation, serving those with severe service needs, etc.).

# **General Documentation Standards and Recordkeeping Requirements**

# Policies and Procedures

Recipients must have written policies and procedures that:

- Require intake staff to document eligibility at intake/screening
- Specify the evidence that must be used to establish and verify homeless or at-risk status
- Include standards for documenting due diligence

Both the recipient and any subrecipients involved in operating the project must follow these policies and procedures.

# **HUD's General Documentation Standards**

All documentation must:

- 1. Identify the entity or party providing the verification
- 2. Identify the individual or family needing assistance
- 3. Provide sufficient detail regarding the specific condition or criterion being documented. (Where individual and family have been staying, for how long, and how long services have been provided by outreach person or agency)

# **HUD's Preferred Order for Obtaining Evidence**

- **1.** *Third-Party documentation* Verification from a person or entity other than intake staff or the individual/head of household seeking assistance. This includes the following:
  - Source documents- Examples include HMIS/comparable database records (CoC <u>FAQ 2757</u>), or discharge paperwork from an institution (<u>CoC FAQ 2753</u>) that includes dates; or
  - Written verification- all written third-party documentation should meet the following requirements:
    - Be issued on third-party letterhead; come from an agency email address; or be a statement receipt or form (exception: information coming from HMIS, or a letter from a reliable community member).
    - o Be signed and dated by third-party; or
  - Oral Verification (has to be documented) all oral verification should meet the following requirements:
    - o Identify the third-party providing the oral verification and the date oral verification was received.
    - o Identify the intake worker recording the oral statement.
    - o Include signed and dated certification by the intake worker as true and complete.
- **2.** *Intake worker observation* Documentation of an intake worker observation must conform to the general documentation standards, identify the intake worker making the observation, and be signed and dated by the intake worker as true and complete.



When are intake worker observations considered third-party documentation and when are they not?

**Third-Party Intake Observation-** Intake worker observations may only count for the specific month(s) in which they encountered the individual or head of household (place of residence or in another setting). This can include encounters at a drop-in center or soup kitchen where an intake worker is employed and a client reported to the intake worker that they were residing in a place not meant for human habitation.

**2nd Party Intake Observation** - Where an intake worker's only encounter with the individual or head of household is at the current point in which they are seeking assistance, the intake worker's observation will not qualify as third-party documentation. An intake worker will then be responsible for documenting staff due diligence in attempting to obtain third-party documentation.

- **3. Self-Certification** Certification from the person seeking services must conform to the general documentation standards and
  - Identify the individual or head of household providing self-certification
  - Include signed and dated certification by the individual or head of household as true and complete
  - If the self-certification must be verified by a third party, it has to meet the criteria above and must also be verified by intake staff following HUD's preferred order of documentation (e.g. For non-victim service providers (when serving Category 4) self-certification must be supported by third-party documentation if doing so does not jeopardize the potential program participant's health or safety).

# **Due Diligence documentation**

Due diligence documentation is required when third-party documentation cannot be obtained (2<sup>nd</sup> and 3<sup>rd</sup> Priority documentation requires due diligence documentation)

Documentation should include the following:

- ✓ Description of efforts to contact and obtain third-party documentation, including dates, times, and supporting documentation
- ✓ Description of outcomes, including obstacles encountered
- ✓ Signed and dated certification by intake workers that all documents are true and complete

To assist with meeting recordkeeping requirements, the San Diego City and County CoC has created Standard Eligibility Forms that can be used to verify homelessness and can be found on the RTFH website.

# **CoC Standard Eligibility Forms**

- Homeless Verification Checklist (For non-PSH projects only)
- Imminent Risk of Homelessness Verification (For projects serving Category 2)
- Chronic Homelessness Verification Packet (For 100% Dedicated PSH Projects)
- DedicatedPLUS Verification Packet (For DedicatedPLUS PSH Projects)
- **Disability Certification** (For CoC funded projects with disability eligibility requirements)



# **Third-Party Documents**

- Third-Party Homeless Verification (Can be used by <u>All</u> programs) Used to certify program enrollments in qualifying ES, TH, Safe Haven, and Hotel/Motel Voucher programs paid for by a charitable organization, federal, state, or local program
- Third-Party Oral Verification (Can be used by <u>All</u> programs) Used to document Third-Party oral statements for all HUD Homeless Categories
- Homeless Observation Verification (Can be used by <u>All</u> programs) Used to certify documented Third-Party observations/encounters of living conditions in a place not meant for human habitation during current or prior months of homelessness.

# **Intake Worker and Self Certification Documents**

- 2<sup>nd</sup> Party Intake Worker Observation (Can be used by <u>All</u> programs) If third-party documentation is not available, a program intake worker may provide second-party documentation of the applicant's homelessness by one of two methods: 1) The intake worker may go out and physically observe the applicant's place of residence if the intake worker's only encounter with the individual or head of household is at the current point in which they are seeking assistance or 2) The intake worker may certify the applicant's homelessness in their professional capacity based on the intake conversation with the applicant. Intake workers <u>MUST</u> also complete the staff Due Diligence section within the form.
- **Self Certification of Homelessness** (For non-PSH programs)- Use, as a last resort, when Third-Party documentation could not be obtained. The program's intake worker <u>MUST</u> also complete the staff Due Diligence section within the form.
- Chronic Homelessness Self Certification (For PSH programs) Use, as a last resort, when Third-Party documentation could not be obtained. The program's intake worker <u>MUST</u> also complete the staff Due Diligence section within the form.

# **Documentation Standards by HUD Category and Subcategory**

The table begins on the next page



# Category 1: Literally Homeless (Specific Documentation Standards)

Subcategory (if applicable)

Documentation Requirements (by subcategory)

1. Place not Meant for Human Habitation (car, parks, streets, abandoned buildings, etc.)

Notes: When using HMIS as source documentation you may print out a screenshot of the Current Living Situation
Assessment Details (formerly known as "outreach contacts"). The Current Living Situation
Assessments can be found within an Outreach program enrollment within HMIS. Including a date & time stamp on the printout is required to show documentation was obtained at intake.

Documentation of at least one single encounter in one month is sufficient for documenting chronic homelessness as long as there is no evidence of a break during the same month. The record must be tied to the applicant.

Third-party source documents from HMIS must contain information about the dates the potential program participant resided there. Also, should conform with general documentation standards.

### Third-Party Documentation (1st Priority)

- <u>Source Documents</u> Utilization of an HMIS record from a street outreach contact.
- Written Verification Be issued on third-party letterhead, come from an agency email address, or be a statement receipt or form. The form that can be used is the Third-Party Verification form (for non-PSH) or the Homeless Observation Verification Form. Documentation must conform to general documentation standards.
- <u>Third-Party Oral Verification</u> All oral verification should meet the following requirements:
  - o Identify the third-party providing the oral verification and the date oral verification was received.
  - o Identify the intake worker recording the oral statement.
  - Include signed and dated certification by the intake worker as true and complete.

RTFH created a **Third-Party Oral Verification** form that can be used to record an oral statement obtained from an appropriate third-party.

# Intake Worker Observation (2<sup>nd</sup> Priority)

If the only encounter with an individual or head of household is at the current point in which they are seeking assistance then the intake worker may provide second-party written documentation of the applicant's homelessness by one of two methods: 1) The intake worker may go out and physically observe the applicant's place of residence or 2) The intake worker may certify the applicant's homelessness in their professional capacity (if place of residence was not observed) based on the intake conversation with the applicant. This could include months in which the individual or head of household could not remember but where the intake worker believes, based on their professional judgment that it is reasonable to assume that the individual or head of household had been residing in a place not meant for human habitation Intake workers MUST also complete the staff Due Diligence section within the form.

RTFH created a 2<sup>nd</sup> Party Intake Worker Observation form that can be used.

# **Self Certification (3rd Priority)**

- Must conform with general documentation standards, identify the individual
  or head of household providing the self-certification, and include signed and
  dated certification by the individual or head of household as true and
  complete.
- The program's intake worker <u>MUST</u> also complete the staff Due Diligence section.

RTFH has created a **Self Certification of Homelessness** Form (for non-PSH) and a **Chronic Homelessness Self Certification** form that can be used.



# 2. Stays in an Emergency Shelter, Hotel/Motel paid for by an organization, Safe Haven, or Transitional Housing stay for homeless persons

Notes: When using an HMIS record you can print out a screenshot from the program history tab or pull a "Client Enrollment Details" report under the Client Reports section of the HMIS. This can be found under the printer icon on the client's profile page. Including a date & time stamp on the printout is required to show documentation was obtained at intake. An automated date and timestamp can be generated by inserting one via headers/footers. The "Client Enrollment Details" report already includes a selfgenerated date & timestamp.

HMIS Record Printed On: 7/3/2024 8:43 AM

3. Exiting an institution where (s)he they has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Note: If the prior living situation was transitional housing for homeless person then a potential participant would not meet the homeless definition under this subcategory.

Institutional stays include jails, hospitals, inpatient treatment centers, or similar facilities. <u>FAQ ID: 1460</u> provides more guidance on assessing youth coming from a foster care placement.

# Third-Party Documentation (1st Priority)

- <u>Source Documents</u> Utilization of an HMIS/Comparable database record for a single record of a stay in an emergency, hotel/motel voucher program, safe haven, or transitional housing program for homeless persons.
- Written Verification Be issued on third-party letterhead, come from an agency email address, or be a statement receipt or form. The form that can be used is the Third-Party Verification Form which is to be completed by the appropriate third-party entity.
- <u>Third-Party Oral Verification</u> All oral verification should meet the following requirements:
  - Identify the third-party providing the oral verification and the date oral verification was received.
  - o Identify the intake worker recording the oral statement.
  - Include signed and dated certification by the intake worker as true and complete.

RTFH created a **Third-Party Oral Verification** form that can be used to record an oral statement obtained from an appropriate third-party.

Note: Not likely to use intake observations under this subcategory.

### Third-Party Documentation (1st Priority)

- Needs documentation to specify the duration of stay, which must be 90 days or less and
- <u>Must</u> document stay in an emergency shelter or in a place not meant for human habitation immediately before entering the institution by following HUD's preferred order of documentation.
- Examples of Documentation are pre-existing records, discharge paperwork, or written verification to be issued on third-party letterhead from the appropriate third- party and must conform with the general documentation standards. Third-Party Verification Form could be used.

# **Self Certification (3rd Priority)**

- Must conform with general documentation standards, identify the individual
  or head of household providing the self-certification, and include signed and
  dated certification by the individual or head of household as true and
  complete.
- The program's intake worker <u>MUST</u> also complete the staff Due Diligence section.

RTFH has created a **Self Certification of Homelessness** Form (for non-PSH) and a **Chronic Homelessness Self Certification** form that can be used.



# Category 2: Imminent Risk of Homelessness (Specific Documentation Standards)

An individual or family who will imminently lose their primary nighttime residence provided that:

- 1. Residence will be lost within 14 days of the date of application for homeless assistance:
- 2. No subsequent residence has been identified; and
- 3. The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Each of the 3 parts of the definition must be documented in the client file.

## By specific condition

To document Category program staff must use the Imminent Risk of Homelessness Certification Form

Third-Party Documentation (1st Priority)

# PART 1

- 1. A Housing Loss in 14 days Rents or Owns Housing
  - Court order resulting from an eviction notice or equivalent notice under applicable state law.
- 1. B Housing Loss in 14 days Hotel/Motel self-paid
  - Evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance (Ex: hotel bill and record that the household paid the bill and a record of an individual's savings demonstrating they cannot afford a stay for 14 days or more.
- 1. C Housing Loss in 14 days When sharing with others
  - Oral statement by the individual or head of household that the owner or renter of the resident will not allow them to stay for more than 14 days <u>and</u> documentation by staff of the statement the client made to staff <u>and</u>
    - Written verification (Ex: Letter from host home family stating the individual or household can no longer stay in their home and housing will be lost within 14 days of the individual/ household applying for homelessness assistance) from the owner or renter of the residence verifying the client's statement <u>or</u>
    - ☐ Staff due diligence describing attempts to secure verification from the owner or renter of the residence

RTFH created a **Third-Party Oral Verification** form that can be used to record the individual's oral statement and record the verified oral statement from the third-party (entity sharing housing with the applicant).

### PART 2

# No subsequent residence has been identified AND

 Self-certification is sufficient and other documents may support it when possible. Use Self Certification of Homelessness form.

### PART 3

- 3. Individual/family lacks the resources or support networks to obtain other permanent housing
  - Self-certification is sufficient and other documents may support it when possible. Use Self Certification of Homelessness form.



# Category 4: Fleeing/Attempting to Flee Domestic Violence (Specific Documentation Standards)

Any individual or family who:

- 1. Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or lifethreatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized
- has no other residence; and
- lacks the resources to obtain other safe permanent housing

Note: The <u>domestic violence</u> definition also covers physical, sexual, verbal, psychological, <u>economic</u>, or <u>technological</u> <u>abuse</u>. HUD also considers human trafficking as applicable under the Category 4 Definition.

Each of the 3 parts of the definition must be documented in the client file.

If you are a Victim Service Provide
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The Certification of Homelessness form is sufficient and <u>all</u> parts must be
certified <b>OR</b>

☐ Oral Statement is documented and certified by the intake worker

If you are <u>not</u> a Victim Service Provider, and safety wouldn't be jeopardized, an oral statement should be documented by:

- Self Certification signed by the individual or head of household is acceptable, but you must support self certification with third-party documentation if doing so does not jeopardize the potential program participant's health and safety (determined by the client).
- Any documentation in the case file must only include the minimum amount of information necessary to document homeless status.
- If obtaining third-party documentation would jeopardize the health or safety of the potential program participant, the intake worker should record the safety concerns in their case file notes along with the self-certification.

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# <u>And</u>

- Self Certification 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.

### Overall:

The Client Self Certification of Homelessness can be used to document homelessness under Category 4, provided that the potential program applicant certifies all three parts of the definition. Non-victim service providers have an additional requirement: if it is safe to do so, third-party documentation should be obtained from an entity where the potential participant has sought assistance. If the applicant feels unsafe, their safety concerns must be noted in a case file note and should be attached to the self-certification form (include the case note in the Eligibility section of the case file).

### Examples of Acceptable Third-Party Documentation

- A signed and dated letter (on agency letterhead) from a victim service provider, social worker, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance.
- Court records or Law enforcement records (third-party source documents)



# **Chronic Homelessness Documentation Standards**

Documentation	Chronic Homelessness	Documentation Examples
Category	Documentation Requirements	·
Homeless Status	One day of documented homelessness in a month is evidence for the entire month unless there is evidence of a break.  Follow HUD's preferred order of documentation  1. 3rd Party (Source, Written, Oral)  2. Intake Worker Observations  3. Self-Certification  At least 75% of households served in an operating year must have:  At least 9 months of the 12 months documented via 3rd party. Rest can be self-certified.  Up to 25% of households served in an operating year may self-certify for up to 12 months as long as:  Attempts to obtain 3rd-party documentation has been documented AND  The reason(s) that documented.	Third-Party Documentation  HMIS/comparable database record, or individual record of stay at emergency shelter, safe haven, or from a street outreach contact.  Written observation by an outreach or intake worker of encounters with the individual or head of household that includes a description of the conditions where the individual or head of household was living or is currently living.  Written observation by a community member that has physically observed where the person or household was or is currently living (a written referral by another housing/service provider must also be included).  2nd Party and 1st Party Documentation  Intake worker observation  Written observation by intake worker of only encounter with individual or head of household at the point in which they are seeking assistance (see FAQ: 2758)  Self-certification (written) by individual/head of household seeking assistance  Does not need to be notarized  Must be signed by the individual/head of household, and Intake worker must still document the living situation of the individual/head of household seeking assistance, and Intake worker must document all steps taken to obtain higher order of priority evidence (staff due diligence).
Breaks Between Occasions of	HUD's preferred order of documentation when possible	<ul> <li>HMIS records showing breaks in living in places not meant for human habitation, safe haven, or emergency shelter;</li> <li>OR</li> </ul>
Homelessness (at least 7 consecutive nights)	Note: 100% of breaks can be self-certified	<ul> <li>Self-certification stating the details, date, and location of breaks in homelessness</li> </ul>
Disability Documentation	Third-Party Documentation only	<ul> <li>Written verification from a professional licensed by the state to diagnose and treat the identified condition;</li> <li>Written verification from the Social Security Administration (SSA); OR</li> <li>Receipt of a disability check such as Social Security Disability Insurance (SSDI) or Veteran Disability Compensation</li> <li>Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence in paragraph (a)(4)(i)(B)(1), (2), (3), or (5) in section 24 CFR 578. 103</li> </ul>

# **Additional Documentation Parameters:**

- o Document eligibility at intake/screening
- If self-certification of chronic homelessness is received, HUD recommends that the recipient continue to try to obtain Third-Party documentation within 180 days of the participant's enrollment in the project. However, breaks in homelessness can be fully documented by self-certification.



# **Homeless Observation Documentation Guidance**

(Guidance for utilization of Homeless Observation Verification Form)

	Third Douby
	<ul> <li>Third-Party</li> <li>Intake workers who physically observed an applicant's current and previous living situation may provide third party documentation of where an individual or head of household was living or is currently living. Documentation needs to include a description of the conditions and each observation/encounter date.</li> </ul>
Intake Worker Observations	<ul> <li>Encounters made with the applicant in another setting (e.g. soup kitchen or drop-in center) and where the place of residence was not observed must: Specify each month encountered, the nature of the conversations during those months, and based on the intake worker's best knowledge and professional judgment that the individual or head of household was residing in a place not meant for human habitation, an emergency shelter, or in a safe haven. Reference: FAQ: 2758</li> </ul>
	2nd Party
	If an intake worker's only encounter with the applicant is at the current point in which they are seeking assistance, the intake worker's observation will not qualify as third-party documentation.  The 2 <sup>nd</sup> Party Intake Worker Observation form would be used in this case.
	Third-Party
Outreach Worker	<ul> <li>Outreach workers who physically observed an applicant's current and previous living situation may provide third-party documentation of where an individual or head of household was living or is currently living. Documentation needs to include a description of the conditions and each observation/encounter date.</li> </ul>
Observations	<ul> <li>Encounters made with the applicant in another setting (e.g. soup kitchen or drop-in center) and where the place of residence was not observed must: Specify each month encountered, the nature of the conversations during those months, and based on the intake worker's best knowledge and professional judgment that the individual or head of household was residing in a place not meant for human habitation, an emergency shelter, or in a safe haven. Reference: FAQ: 2758</li> </ul>
Housing or Service Providers (Healthcare Professionals,	Third-Party Encounter(s) with an individual or head of household, either at their residence or in another setting, can be documented by housing or service providers in their professional capacity. This documentation must specify each month the encounter occurred, include a description of the observed living conditions, OR document specific encounters with the applicant, the nature of the conversations during those months, and based on the provider's best knowledge and professional judgment, confirm that the individual or head of household was residing in a place not meant for human habitation.
or Law Enforcement) Observations	HUD considers other housing or service providers to include members of law enforcement, a healthcare professional, an educator, or another person that encountered the individual or head of household in their professional capacity and not simply as a member of the community. Reference: FAQ: 2760
	Note: To document oral statements please use the "Third Party Oral Verification" form
Other Community Member Observations	<ul> <li>Third-Party</li> <li>An intake worker may accept as third-party documentation, the oral or written observation of someone in the community, including but not limited to, a shopkeeper, a building owner, or a neighborhood resident (regardless of relationship with the household) who has physically observed where the individual or head of household is or has been residing. The intake worker must use their professional judgment to determine if the source is reliable. (a written referral by another housing/service provider must also be included) Reference: FAQ 2759</li> </ul>
	Note: To document oral statements please use the "Third Party Oral Verification" form.