



## CT BOS CoC Sample Written Intake Procedures

Updated October 30, 2017

### BACKGROUND

***You do not need to include this section in your program policy.***

HUD requires that projects receiving Continuum of Care (CoC) funds maintain and follow written intake procedures establishing how the project will determine and document participant eligibility and establishing the order of priority for obtaining evidence of homelessness as third-party documentation first, intake worker observation second, and certification from the person seeking assistance third.

Recipients and sub-recipients of CoC projects are responsible for the items outlined in the sample policy below, which is intended to help providers comply with requirements established under federal law, by HUD through the CoC Program Interim Rule and the annual CoC NOFA, and by the Connecticut Balance of State CoC (CT BOS). All projects receiving CoC funds are required to have similar policies. Projects may opt to adopt this sample policy or a different policy that fulfills the requirements. Projects are encouraged to omit from this sample policy details that do not apply to their program component type and add details that are specific to their agency's procedures.

In addition to items outlined in this policy, all projects are responsible for complying with any special eligibility requirements established through their project application or the NOFA under which the project was originally funded. For example projects may be required to serve specific subpopulations.

Additional Information regarding HUD requirements is available at:

- HEARTH Homeless Definition Final Rule  
<https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/>
- HUD Final Rule on Chronic Homelessness <https://www.federalregister.gov/articles/2015/12/04/2015-30473/homeless-emergency-assistance-and-rapid-transition-to-housing-defining-chronically-homeless>
- HUD Notice: Prioritizing Persons Experiencing Chronic Homelessness in PSH & Recordkeeping Requirements for Documenting Chronic Homeless Status  
<https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/> HUD Equal Access Final Rule



## Connecticut Balance of State Continuum of Care

Ending Homelessness in Connecticut | Email: [ctboscoc@gmail.com](mailto:ctboscoc@gmail.com) | Website: [www.ctbos.org](http://www.ctbos.org)

<https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>

- HUD Guidance on Application of Fair Housing to Use of Criminal Records by Housing Providers

[http://portal.hud.gov/hudportal/documents/huddoc?id=HUD\\_OGCGuidAppFHAStandCR.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHAStandCR.pdf)

- COC Program Frequently Asked Questions

<https://www.hudexchange.info/coc/faqs/>

### **CT BOS Resources:**

Additional details regarding participant eligibility, eligibility documentation requirements, and sample forms for documenting homelessness and disability are available in these resources provided by CT BOS:

- Participant Disability Verification Form
- Participant Homelessness Verification Form
- Sample Third Party Letters
- Chronic Homelessness Eligibility Checklist
- Adaptable electronic version of this sample policy

Use of these resources is optional but encouraged for CT BOS projects. All CT BOS resources are available at: <http://www.csh.org/csh-solutions/community-work/housing-development-and-operation/2578-2/>



**SAMPLE WRITTEN INTAKE PROCEDURES**

**Purpose:**

The purpose of this policy is to establish intake procedures to ensure:

- Participants in **(INSERT CoC PROJECT NAME)** are eligible for CoC assistance in accordance with federal requirements and CT BOS policies;
- Adequate documentation of eligibility is maintained in all participant files;

Following the steps outlined in the policy will help to reduce risk of recapture of program funds by HUD.

**QUICK REFERENCE GUIDE - ELIGIBILITY FOR CT BOS COC PROGRAMS**

*Important Note: Intended for quick reference only. CoC Programs should carefully review all details regarding homelessness and disability requirements and ensure adequate documentation is in each participant chart.*

Program Component Type	Eligible Participants
<p><b>Permanent Supportive Housing – <u>Not</u> for Chronically Homeless People</b></p> <p>(As of January 2015, all CT BOS PSH is required to prioritize 100% of PSH vacancies for chronically homeless people)</p>	<p>Currently homeless and living in a place not meant for human habitation, in an emergency shelter, transitional housing (originally from the streets or an emergency shelter);</p> <p>OR</p> <p>Is fleeing or attempting to flee domestic violence, dating violence, sexual assault or stalking;</p> <p>AND</p> <p>One or more members of the household is diagnosed with a disability.</p>
<p><b>Permanent Supportive Housing – For <u>Chronically Homeless</u> People</b></p>	<p>Currently living in a place not meant for human habitation or in an emergency shelter (<i>Note: People living in Transitional Housing are not defined as chronically homeless by HUD.</i>);</p> <p>AND</p> <p>Have been homeless and residing in a place not meant for human habitation or in an emergency shelter continuously for at least 12 months or on at least 4 separate occasions in the last 3 years that combined total at least 12 months;</p> <p>AND</p> <p>An adult head of household, or, if there is no adult in the family, a minor head of household, is diagnosed with a disability.</p>
<p><b>Rapid Re-housing</b></p>	<p>Individuals or families coming from emergency shelters or the streets; Youth under age 25 may also qualify under HUD Category 4 (i.e., fleeing domestic violence)</p> <p>AND</p> <p>Must have annual income of less than or equal to 50% Area Median Income (AMI) initially and less than or equal to 30% AMI at each 90 day re-evaluation.</p>
<p><b>Transitional Housing</b></p>	<p>Currently homeless and living in a place not meant for human habitation, in an emergency shelter, or transitional housing; this includes those who have been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days AND who were residing in an emergency shelter or unsheltered location immediately before entering that facility; applicants must be screened for diversion and admitted only if no other options are available.</p> <p>AND Income below 30% of AMI.</p>



## General Intake Procedures:

As required by HUD and CT BOS, this CoC project participates in the local Coordinated Access Network (CAN). The project uses the common assessment tool (i.e. VI-SPDAT) as directed by the CAN, and prioritizes participants for admission in the order established by the CAN's centralized priority list.

Project staff is required to document the following at intake using the verification forms provided by CT BOS, which are consistent with HUD's recordkeeping requirements:

- Eligibility screening for ALL persons seeking assistance;
- Evidence relied upon to establish and verify homeless status and disability status, if applicable;
- Due diligence in attempting to obtain third-party documentation of homelessness, if applicable.

Though initial eligibility screening may occur at the CAN, it is the responsibility of CoC project staff to verify eligibility and ensure that documentation of eligibility is on file prior to admitting all participants.

## Order of Priority for Obtaining Evidence of Homelessness/Chronic Homelessness

Project staff shall use the following order of priority for obtaining evidence:

1. **Third-party documentation**, such as
  - ✓ Letter from a shelter
  - ✓ Letter from an outreach team
  - ✓ Letter from another service provider (e.g., doctor, therapist, counselor, clergy member, etc.)
  - ✓ HMIS record

Letters must:

- ✓ Be on agency letterhead
- ✓ Be signed and dated
- ✓ Include name and title of the person signing

Project staff shall not rely on letters from an applicant, an applicant's friend or family as third-party documentation.

2. **Intake worker observation** of the conditions where the individual was living
3. **Self-certification**, including:
  - ✓ A dated letter signed by the applicant attesting to the qualified locations where the applicant lived and the approximate dates living in each location;**AND**

Intake worker must also document in the client file:



- ✓ The living situation and circumstances that necessitate reliance on self-certified evidence (such as, client was camping in a remote area and did not have contact with any service providers or emergency shelter where client resided was unresponsive to multiple attempts to obtain third party documentation); AND
- ✓ Steps taken to obtain third-party documentation, including documenting attempts to locate HMIS records and attempts to obtain letters from an emergency shelter or other service provider knowledgeable of the applicant's homelessness.

**See below regarding limits on use of self-certification**

### **Limitations on Self-Certification**

Disability cannot be self-certified under any circumstances. In all instances, project staff must perform due diligence as specified above in attempting to obtain third party documentation prior to relying on self-certification. As necessary, for all clients, up to 3 months of homelessness can be documented through self-certification. In limited circumstances, up to the full 12 months of homelessness can be documented through self-certification. Self-certification of the full 12 months should be limited to rare and extreme cases and may not be used for more than 25 percent of households served by a project during an operating year. This limitation does not apply to documentation of breaks in homelessness between separate occasions, which may be documented entirely based on self-report.

### **Definitions:**

Project staff shall use the following definitions when determining eligibility for CoC project assistance:

#### **Literal homelessness:**

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- **Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation**, including a car, park, abandoned building, storage facility, bus or train station, airport, or camping ground.
- **Living in a shelter designated to provide temporary living arrangements**, (i.e., emergency shelter, transitional housing for homeless people, hotels and motels paid for by charitable organizations or federal/state/local government programs
- **Exiting an institution (e.g., jail, hospital)**, to qualify must:
  - ✓ Have resided in the institution for less than 90 days; AND
  - ✓ Have resided in emergency shelter or place not meant for human habitation



immediately before entering the institution.

### **Chronic homelessness:**

All participants admitted after January 15, 2016 qualify as chronically homeless only if:

1. They currently live in a place not meant for human habitation, or an emergency shelter. (People in transitional housing are not chronically homeless); AND
2. They are homeless (as defined in #1 above) for at least 12 months continuously or on 4 separate occasions in the last 3 years totaling 12 months; AND
3. Are disabled as defined by HUD (see below). A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria defined above, including a family whose composition has fluctuated while the head of household has been homeless, also qualifies. To qualify the head of household must be disabled.

Each occasion must be demarcated by a break of 7 or more consecutive nights not residing in a place not meant for human habitation or in shelter. Continuous means without a break of 7 or more consecutive nights.

People residing in an institution for less than 90 days AND who were chronically homeless immediately before entering the institution also qualify. Rapid re-housing (RRH) participants retain their chronically homeless status while participating in RRH; however the time spent in RRH does not count towards the 12 month requirement.

### **Disability:**

Disability is defined by HUD as follows:

- A physical, mental or emotional impairment (includes impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury) that is expected to be long-continuing or of indefinite duration; and substantially impedes the person's ability to live independently; AND could be improved by more suitable housing; OR
- Developmental Disability; OR
- HIV/AIDS

## **Documentation of Eligibility**

### **Evidence of Disability:**

All permanent supportive housing participant files must include evidence of disability as follows:

- ✓ Written verification from professional licensed by the state of Connecticut to



diagnose and treat the qualifying disability and certifying that disability meets the HUD definition of disability (see above); OR

- ✓ Written verification from the Social Security Administration; OR
- ✓ The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation); OR
- ✓ Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence described under bullets 1 through 3 above; OR
- ✓ Other documentation approved by HUD.

### **Evidence of Chronic Homelessness:**

Files for all permanent supportive housing participants entering a bed designated or prioritized for chronically homeless people must include evidence of chronic homelessness as follows:

- ✓ Evidence of current literal homelessness at time of project entry (transitional housing residents are excluded); AND
- ✓ Evidence of meeting continuous or occasions requirements; AND
- ✓ Evidence of disability; AND
- ✓ If applicable, evidence that the person was chronically homeless immediately before entering an institution or rapid re-housing.

Note: As of January 2015, all CT BOS PSH is required to prioritize 100% of PSH vacancies for chronically homeless people.

### **Evidence of Literal Homelessness:**

Files for all permanent supportive housing participants entering a bed **NOT designated or prioritized for chronically homeless** people, and for all participants entering **transitional housing and rapid re-housing**, files must include evidence of literal homelessness as follows:

- ✓ Evidence of current literal homelessness at time of project entry; AND
- ✓ If applicable, evidence that the person was literally homeless immediately before entering an institution or rapid re-housing.

### **Additional Evidence Required for Transitional Housing:**

In addition to evidence of literal homelessness, transitional housing files must document:

- ✓ That all applicants have been screened for diversion and admitted only if no other options are available; AND
- ✓ That all participants have income below 30% of Area Median Income (AMI).



### **Additional Evidence Required for Rapid Re-housing:**

In addition to evidence of literal homelessness, rapid re-housing files must document:

- ✓ That all participants have annual income of less than or equal to 50% Area Median Income (AMI) initially and less than or equal to 30% AMI at each 90 day re-evaluation. (For more information regarding required re-evaluations in RRH see CT BOS Policies.)

### **Prioritization of Chronically Homeless and Other Vulnerable People in Permanent Supportive Housing (PSH)**

All CT BOS CoC-funded PSH beds are required to dedicate or prioritize 100% of their beds to people experiencing chronic homelessness. When filling vacant beds, CoC-funded PSH projects must seek referrals only through their local CAN from the *Statewide By-Name List* maintained by the local CANs and monitored by the Connecticut Department of Housing (CT DOH). This by-name list uses the order of priority established in HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

All CoC-funded PSH projects are required to accept referrals ONLY from the *Statewide By-Name List* that is maintained by each CAN and monitored by CT DOH, This requirement does not include homeless veterans or homeless youth, who have separate processes for prioritization for PSH projects that are dedicated to these populations.

Existing PSH participants being transferred from a different CT BOS PSH project are **exempt** from this order of priority. Transfers must be coordinated and approved by local CAN(s). Any resulting vacancy must be filled using this order of priority. PSH units must be prioritized for eligible applicants residing in the CT BOS area over eligible applicants residing in another CoC.

When no chronically homeless person or no chronically homeless person who meets a project's HUD-approved target population criteria (e.g. families with children, youth under 25, veterans, domestic violence, mental illness, substance abuse, or HIV/AIDS) exists on the *Statewide By-Name List* that is maintained by the local CANs, recipients of CoC Program-funded PSH are required to follow the order of priority for selecting participants outlined in CT BOS Policies<sup>1</sup>, which are consistent with HUD CPD Notice 16-11. CT DOH works with CANs to match eligible applicants to vacancies in their preferred geographic area, and homeless people may decline referrals that are inconsistent with their geographic preferences. Projects are required to follow the order of priority outlined in CT BOS Policies when there is no eligible chronically homeless applicant who wishes to live in the geographic area (local CAN region) where the vacancy exists.

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<sup>1</sup> Most current version of the CT BOS Policies are available on the CT BOS website.





### Fair Housing and Equal Access

All CoC projects must comply with HUD Fair Housing and Equal Access requirements. The Fair Housing Act prohibits discrimination on the basis of race, color, religion, sex, disability, familial status or national origin. Violations of the Fair Housing Act occur when policy or practice has an unjustified discriminatory effect, even when the provider had no intent to discriminate. Where a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on individuals of a particular race, national origin, or other protected class, such policy or practice is unlawful. In accordance with Fair Housing requirements, this project:

- Retains all application records, including outcome and reason for denial;
- Does not use any type of blanket policy against renting to persons with criminal records;
- May, only as necessary to ensure the security of residents and property, use individualized and detailed assessments of criminal records considering only convictions;
- Ensures that use of such information in admission decisions actually assists in ensuring the security of residents and property; and
- Ensures that any use of a criminal record in admission decisions is absolutely necessary, and that no less discriminatory alternative is available.

In accordance with HUD Equal Access requirements, this project:

- Is open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status;
- Considers any group of people that present together for assistance and identify themselves as a family to be a family and serves them together as such;
- Does not separate families because of age or gender of household members;
- Prohibits inquiring about sexual orientation or gender identity to determine eligibility;
- Provides services for transgendered individuals in a manner that corresponds to the person's identified gender; and
- Takes reasonable steps to address participants' safety and privacy concerns.