



Eligibility Documentation

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HOUSING INNOVATIONS

Agenda

- Welcome & Introductions
- Objectives & Overview
- Homelessness Verification
- Age Verification
- Income Verification
- Chronic Homelessness/ DedicatedPlus Verification
- Final Questions & Suggestions



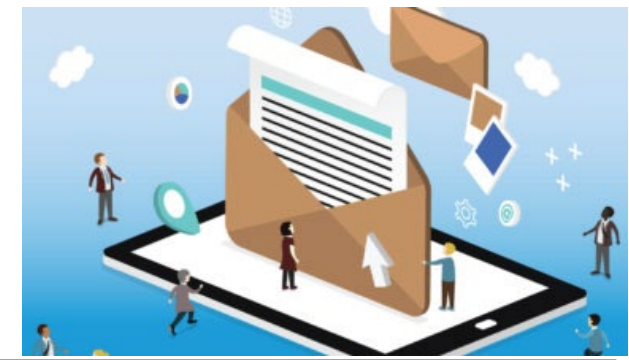


Why is eligibility documentation important?

- Helps to ensure that scarce resources are targeted to serve people with most intensive needs.
- Inadequate eligibility documentation can result in recapture of HUD funds back to the date the person originally entered the project.
- Inadequate eligibility documentation is consistently the most significant finding during DMHAS/CT BOS Monitoring.



Objectives & Overview



Objectives:

- Clarify Department of Housing and Urban Development (HUD) requirements
- Clarify which requirements apply to what types of project
- Specify the types of documents that meet each requirement

Training Structure: Least to most eligibility criteria

- Rapid Rehousing (RRH) & Transitional Housing (TH): homelessness & age(YHDP*) & income
- Permanent Supportive Housing (PSH): DedicatedPlus (i.e., homelessness, chronicity of homelessness & disabling condition)

*YHDP – Youth Housing Demonstration Project

Staff's Role

Staff are responsible for helping applicants to document homelessness.



I'M HERE TO HELP YOU



Homeless Verification

REQUIRED FOR ALL PROJECT TYPES

Homeless Verification Applicability

Required for ALL project types:

- PSH: Permanent Supportive Housing
- RRH: Rapid Rehousing, including Diversion/Rapid Exit
- TH: Transitional Housing, including crisis housing
- TH/RRH: Joint Transitional Housing & Rapid Rehousing
- SSO: Supportive Services Only, including Youth Navigator



Updated Homelessness Verification Form

- Form [linked here](#) (share) is required for all CT BOS CoC funded projects except YHDP projects.
- Summary of changes:
 - Formatting changes to clarify and simplify
 - More person-centered language
- No change to definitions, documentation requirements or process



YHDP Homelessness Verification Form

- Form linked here is required for all YHDP Projects.





Back up Documentation is Required

- Note places on both forms where back up documentation is required, for example:
 - Screenshot of HMIS record
 - Third party letter
 - Complete self-certification and due diligence sections of YHDP form as appropriate

Overview of Homeless Definition

HUD Category	Type	General Eligibility Guidelines*
Category 1	Literally Homeless	Eligible for PSH, RRH, TH & TH/RRH, SSO
Category 2	Imminent Risk of Homelessness	Eligible only for Coordinated Entry & YHDP DivRE, Youth Navigator programs
Category 3	Homeless Under other Federal Statutes	Not eligible for any CoC Program assistance in CT BOS
Category 4	Fleeing/Attempting to Flee Domestic Violence	Eligible for RRH, TH, TH/RRH, all types of YHDP Assistance (DivRE, Youth Navigator, Crisis Housing (TH) & RRH) & Coordinated Entry; Required for DV Bonus RRH

*Note: important details contained in following slides – eligibility limits may apply in certain cases

Overview of Rapid Rehousing Eligibility

Type of RRH	Eligible HUD Categories	Other Eligibility Requirements
YHDP RRH & RRH in Joint TH/RRH Project	Category 1 (including people living in TH); AND Category 4	No member of the household can be older than 24 at project entry (YHDP ONLY); AND Gross annual income must be below 50% of AMI at the time of annual review
DV/Human Trafficking RRH (DV Bonus)	Category 4	Gross annual income must be below 50% of AMI at the time of annual review
All Other RRH	Category 1 (excluding people living in TH); AND Category 4 (For ESG Cat 4 must also qualify as Cat 1)	At the time of annual review, gross annual income must be below 50% of AMI for CoC funded projects or below 30% of AMI for ESG funded projects



Homeless Definition

Category 1: Literally Homeless

Individual or family lacking fixed, regular, & adequate nighttime residence, meaning:

- (i) Primary nighttime residence is place not meant for human habitation (car, bus/train station, etc.)
- (ii) Living in a shelter designated to provide temporary living arrangements*
- (iii) Exiting an institution - resided for 90 days or less **and** resided in emergency shelter or place not meant for human habitation immediately before entering institution



Source: [HUD Exchange](#)

Homeless Definition

Category 4: Domestic Violence (DV)

4) Any individual or family who:

- Is fleeing, or attempting to flee, DV, dating violence, sexual assault, stalking, human trafficking or other dangerous/life-threatening conditions that relate to violence against the individual or family member, including a child, that has either taken place within household's primary nighttime residence or has made individual or family afraid to return to primary nighttime residence; and
- Has no other residence; and
- Lacks resources or support networks, *e.g.*, family, friends, and faith-based or other social networks, to obtain other permanent housing.

See Upcoming Slides for details specific to YHDP



Homelessness Documentation

Category 4

FOR VICTIM SERVICE PROVIDERS

An oral statement by the individual or head of household seeking assistance stating: they are fleeing; they have no subsequent residence, and they lack resources. Statement must be documented by a self-certification or a certification by worker.

FOR NON-VICTIM SERVICE PROVIDERS

In addition to obtaining what is in the column to the left, also needed:

Where the safety of the individual or family is not jeopardized, the oral statement regarding fleeing must be verified.



Document Eligibility at Project Entry

consistent with HMIS Project Entry Date

- HUD requires documentation of homeless status up until the project entry date, i.e., the date on which the project offers and the participant accepts entry into the project
- May precede the date in which the participant is housed.
- Example: Participant accepts entry into RRH project on 12/14/22 & is housed on 12/24/22. Project entry is 12/14/22.
- Documentation acquired - match HMIS Prior living situation response



YHDP – Entry into Multiple Project Types

When transitioning between certain project types must document homelessness at entry into each project:

- Youth Navigator to Diversion Rapid Exit
- Youth Navigator to RRH



Homeless Requirement

Documentation Order of Priority – FIRST PRIORITY

1)Third-party documentation

- HMIS enrollment in ES program up to date of project entry
 - Screenshot or otherwise save history of enrollment in client's file.
- Letter from shelter, drop-in center, soup kitchen or outreach worker
- Letter from other community member (neighbor, clergy, counselor, educator, storekeeper, law enforcement)who can verify living in place not meant for human habitation
 - Letter must:
 - Be on agency letterhead, if applicable
 - Be signed and dated
 - Include name and title of the signer



Third-party Documentation Requirements

- Community members must have physically observed place person is residing AND intake worker must use professional judgement regarding reliability
- Requirements more flexible for housing/service providers. Third Party providers may also document homelessness even if encounter with individual was in another setting (e.g. soup kitchen, drop-in center, doctor's office)- indicate judgement
- Provider must specify each month of an encounter, living conditions and nature of conversations indicating person was homeless. (PSH)
- May not provide third-party documentation for months when did not encounter person (PSH)
- Where provider did not observe local place person resides, must state why believe person is homeless, to best of knowledge, based on professional judgement

Third-Party Documentation Requirements (2)



	Community Members	Intake Worker
Third Party Observation of person living unsheltered	<ul style="list-style-type: none">• Must have physically observed the living location• Must describe actual living location• Must specify months the living situation was observed	<ul style="list-style-type: none">• May document conversation with member of public providing this information if unwilling to give written documentation• Must use professional judgement regarding reliability of information – cite why• Does not have to physically observe location described by community member

Homeless Requirement

Documentation Order of Priority - 2nd & 3rd Priorities

2) Intake worker observation

- Staff member of receiving project has not physically observed where individual is sleeping
- Must include professional judgement

3) Self-certification

- Allowed only as stipulated on slide #22

Reference: [HUD FAQ ID 2761](#)



Self-Certification of Homelessness Limitations & Requirements



- Except as noted below do not use self-certification for TH or RRH
- YHDP: Use only when third party documentation or intake worker observation not obtainable; Must document attempts and barriers to obtaining third party
- Category 4/DV: Use when safety jeopardized by attempt at obtaining Third Party
- PSH - DedicatedPlus: Covered on slide #60
- Always document attempts to obtain Third Party unless it would jeopardize safety

Safety Considerations

- Never contact someone for third-party documentation if the individual or family believes that their health or safety will be jeopardized by contacting that person.
- Document the person's statements about that fear.



Homelessness Documentation (2)

Category 4

When determining Category 4 eligibility, the survivor is the expert in their living situation and can define what they consider life threatening

Source: [National Network to End Domestic Violence](#)



Homelessness Documentation

Type of homelessness reported should match documentation and HMIS record



Homelessness Documentation

Category 1: Example – HMIS Record

CaseWorthy CASE MANAGEMENT MY CASEWORTHY

HMIS Enrollment Member Summary - READ ONLY

Status	Project / Assigned Case Mgr	Project Start-Exit Dates
Exited From Program	Coordinated Access 211	3/30/2018 - 10/29/2018
Exited From Program	Pacific House - Job Readiness Program	7/24/2016 - 3/26/2018
Enrolled In Program	Individual VI-SPDAT v2	8/1/2016 - Open
Exited From Program	Fairfield County Coordinated Access Network	7/28/2016 - 8/27/2016
Exited From Program	Pacific House- Day Program (MF) inactive-Pacheco, inactive-Miriam	7/25/2016 - 3/26/2018
Exited From Program	Pacific House (ES)(IND)(SM)(DOH)	7/25/2016 - 3/26/2018

Client ID: 170177
Family ID: 108416
Family Name:

Find Client

Case Management

Client Information

VI-SPDAT v2

Case Management > Program Enrollment provides Start & Exit dates for emergency shelter enrollments

Homelessness Documentation

Category 1: Example – emergency shelter & outreach letters



(Agency Letterhead)

Hope House
123 Mountain Blvd.
Sometown, CT 11111

February 8, 2023
To whom it May Concern:

This letter is to certify that Mr. John Doe is currently residing at our emergency shelter and has been staying here for the past 4 months, starting November 7th, 2022.

Contact me with any questions at 570-867-5309.

Sincerely,
(Signature)
Jane Doe
Program Director

(Agency Letterhead)

Hope House
123 Mountain Blvd.
Sometown, CT 11111

February 8, 2023
To whom it May Concern:

This letter is to certify that Mr. John Doe is currently a participant in our Outreach Program. Outreach staff have observed him in various unsheltered settings each month for the past 6 months. He is currently staying in an abandoned mobile home without electricity or running water.

Contact me with any questions at 570-867-5309.

Sincerely,
(Signature)
Jane Doe
Program Director

Poll – Do I meet the HUD definition of homelessness?



Molly and her 7-year-old son, Jaden were evicted and lived with family for the past year - moving from place to place. They are currently camping in a tent in the woods.

Based on this information, does the family qualify under HUD's Category 1 definition of homelessness?

Poll - Do I meet the HUD definition of homelessness? (2)



Henry is 41 He has stayed with siblings on and off since his mother died, but now finds himself at the local emergency shelter most nights. He has slept at the shelter 7 of the last 10 nights.

Based on the information above, does Henry qualify under HUD's Category 1 definition of homelessness?

Poll - Do I meet the HUD definition of homelessness? (3)

Sherri is a 61-year-old woman who has been living under the Maple Street Bridge on and off for the past 3 months. She couch-surfs with friends sometimes. Outreach staff interact with her regularly.

She has been admitted to a RRH program and is looking for housing. Sherri is staying with a friend, when the outreach worker encounters her at the park and tells her that she has a lease signing appointment next week. Is Sherri eligible to move into that unit under HUD's Category 1 definition?





Income Verification

REQUIRED AT PROJECT ENTRY FOR TH
(EXCEPT YHDP CRISIS HOUSING);

REQUIRED AT ANNUAL RECERTIFICATION FOR
RRH

TH Income Requirement

Projects may serve only participants with income below 30% of area median income (AMI)

- AMI can be found on HUD Website under [Median Family Income](#)
- Sort for applicable location





RRH Income Requirement

- At the time of annual review, gross annual income must be below 50% of AMI for CoC funded projects .
- At the time of annual review, gross annual income must be below below 30% of AMI for ESG funded projects



YHDP Verifications

Homeless Definition

Category 2: Imminent risk of homelessness*



Individual or family who will imminently lose their nighttime residence, provided that:

- (i) Residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; and
- (iii) Lack resources or support networks needed to obtain other permanent housing

*Only applicable to Coordinated Entry, YHDP DivRE, Youth Navigator Programs

Homelessness Documentation

Category 2

Documentation that youth will lose their housing within 14 days:

- Eviction Notice or equivalent legal document; or
- Proof of inability to pay for hotel or motel; or
- Statement by youth that they cannot continue to stay at the place they have been AND written or oral verification from owner or renter of housing, or documentation of intake worker's attempts to verify; **AND**
- Documentation that the youth has no safe alternative housing, no financial or other resources, and no family or other support networks (can be self-certified without attempts to document)





Homeless Documentation Category 2: Imminent Risk of Homelessness

- Category 2 is **ONLY** eligible for Coordinated Entry & YHDP DivRE, Youth Navigator programs
- Reach out to landlord, family member, etc. where person is staying
 - ✓ Good diversion practice
 - ✓ Document as third-party documentation attempt

YHDP Homeless Verification

Category 4, Fleeing DV: Inclusions



Includes youth meeting definition described previously, and also

- Trading sex for housing
- Human trafficking
- Physical abuse
- Violence (or perceived threat of violence) because of individual's sexual orientation or gender identity
- Emotional abuse (e.g. threats, intimidation and exposure to trauma)

See [CT YHDP Determining Homeless Status of Youth](#)

YHDP Homeless Verification

Category 4, Fleeing DV: Inclusions

- Family conflict causing youth to feel physically or emotionally unsafe
- Financial abuse (e.g. controlling income, identity theft to use credit)
- Active drug/illegal substance use in youth's housing
- Gang or neighborhood violence directed at youth in their home
- Other illegal activity putting youth or youth's child at risk



Poll - Do I meet the HUD definition of homelessness?



Jordyn is 24-years old and residing in a 28-day rehabilitation facility for substance use. Before rehab, they were staying with family, but are no longer welcome. They do not currently have a source of income and are being released from the program in 8 days. Jordyn asserts that they have no resources and nobody else to stay with.

Does Jordyn qualify under the HUD Category 1 definition of homelessness?

Under HUD Category 2 definition of homelessness?

What kind of project are they eligible for?



Age Verification

REQUIRED FOR ALL YHDP: RAPID REHOUSING (RRH), DIVERSION/RAPID EXIT (DIV/RE) , CRISIS HOUSING (TH), YOUTH NAVIGATOR(SSO)

HUD YHDP Age Requirement

- May not enroll participants under 18 unless emancipated
- No member of the household can be older than 24 at project entry
- No age limit post project entry



Age Verification

Documentation

Acceptable Sources:

- U.S. Birth Certificate
- U.S. Passport
- Government-issued Identification Card
- Naturalization Certificate
- Certificate of Armed Services Record (DD-214)
- Other Legal Document
- Self-Certification– must document efforts to assist to obtain documentation





Self Certification of Age and Homelessness

- If you cannot obtain third-party documentation, youth can self-certify
- Document your efforts to obtain third-party on [CT YHDP Homelessness Verification Form](#)
- If you are able to obtain documentation, add it to the case file.

IMPORTANT REMINDER: Safety Considerations

- Never contact someone for third-party documentation if the individual or family believes that their health or safety will be jeopardized by contacting that person.
- Document the person's statements about that fear.



Document Attempts to Verify Homelessness and Age



EXAMPLES

- 1/5/23: Participant reports that he is fleeing DV in his most recent home shared with boyfriend and that contacting boyfriend to verify homelessness or returning there to obtain his birth certificate and driver's license would be dangerous.
- 1/6/23: Called Mr. Jones, owner of home where participant reported living prior to boyfriend's place, to explore if participant might return. Left message.
- 1/7/23: Contacted Ms. Smith, participant's grandmother, to obtain copy of birth certificate.
- 1/15/23: Assisted participant to apply for a duplicate of his driver's license.



Zoom Polls

Poll - Can I get YHDP Assistance?

Lila is 16 and lives with her mom in a family shelter. They need help to rent a place, but the regular CT RRH program in their area is only helping people who are chronically homeless. They have been in shelter for 6 months. Are they eligible for YHDP assistance?



Sam



Sam is 20 and has been trying to stay away from his parents' house ever since local gang members started showing up there to recruit him. He's been crashing with friends, but their parents won't let him stay more than one or two nights. They keep telling him to go home, but he's afraid. Is Sam qualified for YHDP assistance under the HUD Category 4 definition?



Ray

Ray's mom insists on continuing to use his birth name and pronouns. She is emotionally abusive, regularly calling him names, making threats and tearing him down. He feels unsafe at home but is not sure where he will go. Is Sam qualified for YHDP assistance under the HUD Category 4 definition?



Dedicated Plus

REQUIRED FOR PSH

Chronic Homeless (CH)

Definition

- 1) Live in a place not meant for human habitation, or an emergency shelter (ES), or a safe haven (SH) (people in TH are not CH); AND
- 2) Homeless (as defined above) for at least 1 year continuously or on 4 separate occasions in the last 3 years for a total of 12 months; AND
- 3) Disabled as defined by HUD



Chronic Homeless

Definition (2)

- ✓ People residing in institution <90 days AND were literally homeless (unsheltered, ES, SH only) immediately before entering qualify (time in institution counts toward 12 mos.)
- ✓ Families with adult or minor Head of Household meeting all criteria on previous slide qualify.
- ✓ RRH participants retain CH status (if CH at time of program entry). Time in RRH does NOT count towards CH.
- ✓ **Occasion is marked by break of 7 or more consecutive nights not residing in place not meant for human habitation, ES, or SH.**
- ✓ Continuous means without a break of 7 or more consecutive nights.
- ✓ Third-party documentation of a single encounter is sufficient to consider an individual homeless for the entire month unless there is evidence of a break (e.g., an encounter in 5/1/22 counts for 5/1/22-5/31/22)



DedicatedPLUS

Definition



Individuals, households with children, and unaccompanied youth that at intake are:

**(1) experiencing chronic homelessness (CH);
or**

(2) residing in a Transition Housing (TH) project that will be eliminated and was chronically homeless when entered TH project; or

DedicatedPLUS

Definition



(3) residing in Emergency Shelter, Safe Haven or unsheltered location and had been admitted and enrolled in a PSH or RRH project (having met CH criteria upon entering) within last year, but was unable to maintain housing placement*; or

*HUD has clarified: the third eligible category refers to persons who were admitted for entry, enrolled in the PSH or RRH project **AND** exited the project – all within the previous 12 months from the date of entry into the DedicatedPLUS project. (AAQ #168538)

DedicatedPLUS

Definition (2)



(4) residing in TH funded by a Joint TH/PH-RRH component project and who were experiencing CH prior to entering the project; or

(5) residing in Emergency Shelter, Safe Haven or unsheltered location for at least 12 months in the last 3 years, but has not done so on 4 separate occasions and individual or head of household meet the definition of ‘homeless individual with a disability’; or

(6) receiving assistance through Department of Veterans Affairs (VA)-funded homeless assistance program and met 1 of the above criteria at initial intake to the VA's homeless assistance system.



DedicatedPLUS v. Chronic



- Criteria for DedicatedPLUS and chronic homelessness are very similar.
- DedicatedPLUS projects must serve only:
 - Households with a disabled adult/head of household
 - Households who were homeless for a least 12 months

DedicatedPLUS v. Chronic (2)

A DedicatedPLUSproject can serve:

- Disabled people who have been homeless for 12 months over 3 years during fewer than 4 separate occasions

< 4 Occasions

DedicatedPLUS v. Chronic (3)

A DedicatedPLUS project can serve:

- People who had been admitted, enrolled in and exited a PSH or RRH project within the last year who were unable to maintain housing placement if:
 - Chronic when entered PSH or RRH
 - Currently living in shelter, safe haven or unsheltered



DedicatedPLUS

Documentation



Evidence of DedicatedPLUS Status must include:

- Evidence of homeless status at time of PSH Ded+ project entry; AND
- Evidence of at least 12 months of homelessness with last 3 years; AND
- Evidence of disability;

AND, If applicable:

- Evidence of CH immediately before entering TH/RRH, RRH or PSH;
- AND evidence of admission/enrollment in **AND** exit from PSH or RRH all within the previous 12 months from date of PSH Ded+ project entry.

For additional details see [Homelessness Verification Form](#)

DedicatedPlus

Documentation: Self Certification



- Disability cannot be self-certified
- For all clients, up to 3 months of homelessness can be documented through self-certification.
- Self-certification of more than 3 months may not be used for more than 25% of households served by a project during an operating year
- Must be accompanied by documentation of intake workers attempts to obtain third-party documentation.
- Documentation of breaks in homelessness between occasions can be entirely based on self-report.
- HUD allows self-certification while third-party documentation is gathered for up to **180 days** (participants enrolled for fewer than 180 days can be excluded from determination of whether at least 75% of participants have at least 9 months of third-party documentation). HUD FAQ 2872

Third-party Documentation

Re-cap

- HMIS record
- Letter from shelter or outreach worker
- Letter from shopkeeper, building owner, neighbor or sister
- Letter from clergy person or educator
- Letter from doctor, counselor or therapist
- Letter from law enforcement

Letters must:

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



Sample Letters

Sample Letters for Documenting: (USE OPTIONAL)

- Chronic Homelessness
- Other Situations that Qualify as DedicatedPLUS
- Due Diligence to Obtain Third-Party Evidence of Homelessness
- Template for Participant Self-Certification of Homelessness





Disability Verification

REQUIRED FOR PSH

Updated Disability Verification Form

- Form [linked here](#) is required for all CT BOS CoC funded PSH projects.
- Summary of changes:
 - More person-centered language
- No change to definition, documentation requirements or process



Disability

Definition



- Physical, mental, or emotional impairment, including that caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury
 - Is expected to be long-continuing or of indefinite duration; and
 - Substantially impedes the individual's ability to live independently; and
 - Could be improved by the provision of more suitable housing conditions
- Developmental disability
- HIV/AIDS

Note: DMHAS eligible disabling condition: Serious mental illness, chronic problems with alcohol, drugs or both, or AIDS and/or related diseases

Documentation of Disability



Written verification from licensed professional

- Must be within scope of license to diagnose and treat disability
- Certification that disability meets HUD's definition

Determination of Disability by Social Security Administration

- Written verification or award letter
- Receipt of disability payment (SSI/SSDI)



Documentation of Disability (2)

Determination of Disability by VA

- Written correspondence from VA or receipt of VA disability payment

CAUTION: Intake staff-recorded observation of disability; no later than 45 days from application for assistance, confirmed by documentation above

Timing of Disability Documentation

HUD has clarified:

- That for people transferring from RRH to PSH, the person must have been disabled at RRH entry; however, documentation of disability must be obtained prior to entry into PSH. Documentation can be obtained after the person is already enrolled in RRH, since the disability must be long-continuing or of indefinite duration. (AAQ #168792)



Poll – Is this a HUD qualified disability?

Troy has struggled to maintain employment due to anxiety and depression. He has been denied Social Security disability benefits three times. He works with an LCSW who can certify that his disability is expected to be long-continuing or of indefinite duration; and substantially impedes his ability to live independently; and could be improved by the provision of more suitable housing conditions.

Does he meet HUD's definition of disability?



Poll – Who can sign the disability verification?

Andre has a disability resulting from a traumatic brain injury and needs help to sustain his housing. Who can sign his disability determination?

- 1) His doctor
- 2) His licensed clinical social worker
- 3) Either one



Poll - SKYE



- They have a HUD qualified disability.
- They were living on the streets from January to July 2022.
- They lived at a residential rehab program for 3 weeks July to August 2022.
- They moved to a motel paid for by ESG in August and remain there.
- Is Skye qualified as DedicatedPLUS as of December 2022?

The Reid Family

- Lived in shelter from January to May 2021
- Stayed with family in North Carolina
- Returned to shelter in CT in June 2022
- Remain in shelter in December 2022
- Oldest child is disabled and receives SSI.
- Do they qualify as DedicatedPLUS as of December 2022?



Natalie



- Natalie has a disabling condition that meets the HUD definition.
- She got kicked out by her family and was in shelter from January to April 2022.
- She moved to RRH from shelter.
- She is being evicted from her RRH unit, but remains enrolled until the marshal locks her out.
- Does she qualify as DedicatedPLUS in December 2022?



Final Questions & Suggestion?

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