

Documenting Homelessness

HUD does not require documentation showing that an applicant is literally homeless for every day of the 12 months used to determine eligibility for chronic homelessness. One documented day within a calendar month is enough to establish homelessness for that entire calendar month, unless there is documentation showing that the applicant had a break in literal homelessness during that month.

For literal homelessness status at time of intake, documentation must show that the applicant was literally homeless within 14 days of eligibility determination.

HUD has established additional specific record-keeping requirements and standards for documenting homelessness status for current literal homelessness, and chronic homelessness that outlined below.

Order of Priority for Collecting Eligibility Documentation

HUD has established an “Order of Priority” for documenting literal homelessness. This order of priority establishes guidelines for how program staff should prioritize different forms of documentation, with attempts to collect higher-priority documentation before moving on to lower- priority documentation. Reasonable efforts should be made to follow the order of priority established by HUD. The order of priority is as follows:

1. **Third Party Verification** – Intake staff should make a reasonable effort to obtain third party documentation for current literal homelessness and for all 12 months showing chronic homelessness. For months that cannot be covered by third party documentation, the effort to do so should be recorded as due diligence.
2. **Intake Worker Observation** – Where applicable, intake worker observation should take priority over self-certification of literal homelessness.
3. **Self-Certification** – For any month that the applicant must document literal homelessness because third-party verification or intake-worker observation is not available, the applicant must provide self-certification of their living situation during that month.

Please Note: All 12 months used to establish chronic homelessness must be covered by one of the following: third party verification, intake worker observation, or self-certification by applicant.

Order of Preference for Third Party Verification

In order to build the strongest case possible for documenting literal homelessness and chronic homelessness, the following order of preference should be used when collecting third party verification.

1. HMIS
2. Third Party Verification provided by a housing or service provider or institutional documentation.

3. Third Party Verification provided by a community member that does not have a personal relationship with the applicant.
4. Third Party Verification provided by a community member that has a personal relationship with the applicant.

1. HMIS Records

HMIS records can be used to establish shelter stays and outreach worker contacts. An HMIS record should be a “screen shot” that includes Client name, Shelter name, and entry/exit dates, or dates of case manager observation and location.

2. Institutional Records

Institutions, such as hospitals or prisons, can provide official records that confirm institutional stays or literal homelessness at time of intake. If an individual qualifies as chronically homeless because he or she has been residing in an institutional care facility for less than 90 days and was living in a shelter or place not meant for human habitation immediately prior to entering the institutional care facility, evidence must include one of the following:

- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institutional care facility stating the beginning and end dates of the time residing in the institutional care facility. All oral statements must be recorded by the intake worker; or
- Where the evidence listed above is not obtainable, a written record of the intake worker’s due diligence in attempting to obtain that evidence and certification by the individual seeking assistance that states that he or she resided for fewer than 90 days; and third party verification or self-certification that the individual was living in a shelter or place not meant for human habitation immediately prior to entering the institutional care facility.

3. Verification by a Housing or Service Provider or a Community Member

Third party contacts have different authorization to provide verification, based on their relationship with the applicant. Housing and service providers who know the applicant in their professional capacity, such as shelter staff, housing staff from other programs, doctors, teachers, case managers, therapists, or police officers can verify living situations that they see or that they hear about. If they hear about a living situation, they need to clarify that it is their professional opinion that the information is accurate.

Outreach Workers must physically observe an applicant’s living situation to verify current literal homelessness, but may provide verification for previous months of homelessness that they either observed or were told about at the time of the encounter.

Community Members such as shop keepers, volunteers, neighbors, family members or friends may only provide third-party verification for living situations that they physically observed.

Written verification is always preferred over oral verification. There are two circumstances where oral verification is appropriate.

- When it is not possible to obtain written verification.
- When written verification that has already been provided is not complete, and requesting updated written verification is burdensome, program staff can document oral conversations where they obtained clarification about the details of the third-party's encounter with the applicant.

Written third party verification must include a printed name, signature, and contact information of the person providing verification. Details of the verification must provide either the specific date or the month for which verification is being provided, exactly where the applicant was residing, the third party's relationship to the applicant, and why the third party is able to provide verification.

If the written verification is provided by a housing or service provider, the document should be on letterhead. If verification is being provided because the applicant reported their homelessness status to the housing or service provider, then the verification must include certification that the provider believes the information to be accurate.

Documenting Breaks in Homelessness

When documenting episodic chronic homelessness, any breaks in literal homelessness need to be documented and all breaks can be documented using self-certification by the applicant. A minimum of three separate breaks must be documented in the file, in order to establish episodic chronic homelessness.