



Continuum of Care Program

Start-Up Training



Training Housekeeping - Etiquette

When entering Skype – **Select the “Don’t join audio” option**

The audio portion of the training is a conference call. The call-in information is:

Number **1-888-330-1716** Access Code **6399068**

All participants will be in listen only mode – Please use the chat feature to ask questions. To access the chat feature, press this button



If we are unable to answer questions, we will provide follow-up responses to registrants. Please contact your CPD Representative for any additional clarifications.

Should we have time to answer questions, we will unmute all participants. At that time, we will ask you to mute your phones and only unmute to ask questions. If your phone does not have a mute feature, you may use *6 to toggle mute.



Homeless Definition Refresher & Eligibility



Overview of Homeless Definition

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless Under other Federal Statutes
- Category 4: Fleeing/Attempting to Flee Domestic Violence



Category 1: Literally Homeless

- An individual or family who lacks a fixed, regular, and adequate nighttime residence
- Three circumstances meet this definition:
 - Sleeping in a place not designed for or ordinarily used as a regular sleeping accommodation
 - Living in a shelter designated to provide temporary living arrangements
 - Exiting an institution (e.g., jail, hospital) where they resided for 90 days or less and were residing in emergency shelter or place not meant for human habitation immediately before entering institution



Category 2: Imminent Risk

- Individuals/families who will imminently lose their primary nighttime residence within 14 days

AND

- Have no subsequent residence identified

AND



Category 2: Imminent Risk

- Lack the resources or support networks needed to obtain other permanent housing
 - Primary nighttime residences include housing the individual/family owns, rents, or shares with others and rooms in hotels/motels that are paid for by the individual/family seeking assistance

Note: Persons who will be exiting institutions in the next 14 days are not defined as homeless under Category 2



Category 3: Homeless under Other Federal Programs*

- Unaccompanied youth under 25 or families with children and youth who do not otherwise qualify as homeless, but who:
 - Meet homeless definition under another federal statute
- AND
- Have not had lease, ownership interest, or occupancy agreement in permanent housing any time during last 60 days
- AND
- Have experienced two or more moves during last 60 days

*Serving this population with grant funds requires HUD approval



Category 3: Homeless under Other Federal Programs

- Can be expected to continue in such status for an extended period of time because of
 - Chronic disabilities
 - OR
 - Chronic physical health or mental health conditions
 - OR
 - Histories of domestic violence or childhood abuse (including neglect)
 - OR
 - Presence of a child or youth with a disability
 - OR
 - Two or more barriers to employment



Category 4: Fleeing/Attempting to Flee DV

- Individuals/families fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, who
 - Have no identified subsequent residence
- AND**
- Lack the resources and support networks needed to obtain other permanent housing



Eligibility Per Component Type

	PSH*		RRH	TH	SSO
	New±	Renewal			
Category 1 <i>Literally Homeless</i>	X	X	X	X	X
Category 2 <i>At Imminent Risk</i>				X	X
Category 3 <i>Homeless under other federal programs</i>	X	X	X	X	X
Category 4 <i>Fleeing domestic violence, etc.</i>	X	X	X	X	X

± Requires chronic homeless status

* Requires a disability



Homeless Status Resources

- [CoC Program Toolkit – Determining and Documenting Homelessness](#)
- **SNAPS In Focus:**
 - [Addressing the Needs of Persons Fleeing Domestic Violence](#)
 - [Addressing the Needs of Human Trafficking Victims](#)
 - [Ending Veteran Homelessness and What it Means for Zero:2016 Communities](#)
 - [Equal Access for Transgender People](#)



Disability & Chronic Homelessness Refresher



Definition of Disability



Definition of Disability

- Disability is defined as having one or more of:
 - Physical, mental or emotional impairment
 - Developmental disability
 - HIV/AIDS
- Once a program participant's disability is documented, this status does not need to be recertified after intake



Definition of Disability

- A physical, mental, or emotional impairment,
 - 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



Definition of Disability

- A developmental disability is defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 USC 15002)
 - Means a severe, chronic disability that:
 - Is attributable to a mental or physical impairment or combination
- AND**
- Is manifested before age 22
- AND**
- Is likely to continue indefinitely

AND



Definition of Disability

Results in substantial limitations in *three or more* major life activities

- Self-care
- Receptive and expressive language
- Learning
- Mobility
- Self-direction
- Capacity for independent living
- Economic self-sufficiency



Definition of Disability

- Developmental disability reflects the need for:
 - A combination and sequence of special, interdisciplinary or generic services
 - OR**
 - Individualized supports
 - OR**
 - Other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated



HIV/AIDS

- Includes the disease of acquired immunodeficiency syndrome (AIDS)
- OR**
- Any conditions arising from the etiologic agent for AIDS including infection with HIV



Definition of Disability

- PSH projects may only accept individuals with a qualifying disability or families where one member of the family has a qualifying disability
- Projects that only serve individuals and families who are chronically homeless, the head of household must have the qualifying disability



Definition of Disability

- Disability documentation must be third-party and must be documented by:
 - A professional licensed by the state to diagnose and treat that condition
 - OR**
 - Social Security Administration (SSA) for persons receiving disability benefits (SSI/SSDI check, Veteran Disability Compensation, etc.)



Definition of Disability

- Intake staff observations
 - Only acceptable in the absence of third-party verification and must be confirmed and accompanied by written third-party verification no later than 45 days from initial intake.
- Oral third-party and self-certification are **not** appropriate for documentation of disability.
- If participant is deemed eligible because of developmental disability or HIV/AIDS, not required to pass the 3-part test for disability.



Chronically Homeless Status



Final Definition of Chronically Homeless

1. A “homeless individual with a disability,” as defined in the Act, who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Has been homeless (as described above) continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months
 - Occasions separated by a break of at least seven nights
 - Stays in institution of fewer than 90 days do not constitute a break



Final Definition of Chronically Homeless

2. An individual who has been residing in an institutional care facility for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or



Final Definition of Chronically Homeless

3. 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 in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless



Documenting Chronic Homelessness

- Consistent with recordkeeping requirements established in Notice CPD-14-012
- Creates a reasonable, uniform standard to ensure consistency in how chronic homelessness is documented



Documenting Chronic Homelessness

- Focus on:
 - Written Intake Procedures
 - Third Party Documentation
 - An individual or family's homeless history
 - Documenting Breaks
 - Institutional Stays
 - Disability(ies)



Transferring from PSH to PSH

- Once an eligible household is placed in PSH, the household does not retain their homeless or chronically homeless status.
- However, PSH projects may serve individuals and families from other PSH projects as long as program participants originally met the eligibility requirements for the PSH project to which they are transferring at the time they entered their initial PSH project.
- This means that an individual or family may transfer from one permanent supportive housing program to another under the CoC Program.



RRH as Bridge to PSH

- Program participants receiving RRH may maintain their homeless or chronically homeless status if they were homeless or chronically homeless at entry into the project for purposes of remaining eligible for other permanent housing placements (including CoC funded PSH).
- The program participants are not, however, considered to be homeless for counting purposes.
- This guidance is further explained in [FAQ 529](#) and [FAQ 530](#).



Chronic Homelessness Resources

- [Final regulation on the definition of "chronically homeless"](#)
- [Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status \(PDF\)](#)
- [CoC Competition Focus: Ending Chronic Homelessness](#)



Chronic Homelessness Resources

- [Sample Chronic Homelessness Documentation Checklist](#)
- view the [Defining “Chronically Homeless” Final Rule Webinar](#) and [Frequently Asked Questions \(FAQs\)](#).



Permanent Supportive Housing Prioritization Notice

CPD-16-11: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing



Background

- **Ending chronic homelessness**—requires that limited resources are used effectively and that households most in need of assistance are prioritized.
- **Progress since 2007**—CoC funded PSH beds dedicated to persons experiencing chronic homelessness increased from 24,760 in 2007 to 72,316 in 2016, contributing to a 35.3% decrease in the number of individuals experiencing chronic homelessness in that time.
- **Still work to be done**—Despite the overall increase in the number of dedicated PSH beds, only 38.2 % of all CoC Program funded PSH beds are dedicated to CH.



HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for **dedicated and prioritized PSH**
2. Establish a recommended order of priority for **PSH that is not dedicated or prioritized** for chronic homelessness



PSH Dedication & Prioritization Strategies

- **Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.** Recipients must use Dedicated PSH beds to serve persons experiencing chronic homelessness (static).
- **Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.** Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds that are not already dedicated to chronic homelessness in a percentage of turnover (might fluctuate).

Both are required by grant agreement to serve the chronically homeless



DedicatedPLUS & Prioritization

FAQ ID 3326 (Nov. 2017) on prioritization under a DedicatedPLUS project
<https://www.hudexchange.info/faqs/3326/for-dedicatedplus-projects-are-there-any-particular-requirements-for-how/>

FAQ ID 3298 (Sept. 2017) on DedicatedPLUS client file documentation needed
<https://www.hudexchange.info/faqs/3298/if-my-project-chooses-to-become-dedicatedplus-what-documentation-will-hud/>

FAQ ID 3284 (August 2017) What is a DedicatedPLUS project?
<https://www.hudexchange.info/faqs/3284/what-is-a-dedicatedplus-project/>

FAQ ID 3247 (July 2017) on the difference between a Dedicated and a DedicatedPLUS bed
<https://www.hudexchange.info/faqs/3247/can-you-explain-the-difference-between-beds-dedicated-to-chronically/>



Documentation of Homelessness



Documenting Homelessness

- Recipients must have written policies and procedures that:
 - Require intake staff to document eligibility at intake/screening
 - Specify the evidence to rely upon to establish and verify homeless status
 - Include standards for documenting due diligence
- Standards must be consistent with recordkeeping requirements and reflect HUD's preferred order



Documenting Homelessness

- In order of preference
 1. Third-party documentation
 2. Intake worker observations
 3. Certification from the person seeking assistance
- Appropriate documentation will vary depending on
 - Type of assistance provided
 - Circumstances of the potential program participant, including individuals fleeing/attempting to flee domestic violence
 - Already available documentation
 - Discharge paperwork
 - HMIS service transactions



Policies for Intake

Remember...

Recipients must participate in the CoC's coordinated assessment as a part of intake

Recipients must follow the CoC's written standards for administering assistance

Recipients must have their own policies and procedures for administering assistance



- Adopt checklists that reflect preferred order •
Incorporate guidance & examples on exceptions to preferred order
- Have staff check for existing documentation first
 - E.g., HMIS records or discharge paperwork
- Create forms for tracking & documenting due diligence



Standards for Documentation

- Adopt standards in policies and procedures
 - Strategy for addressing requirement that records must be sufficient
- General examples include
 - Clearly identifies entity/party providing verification
 - Pertinent to and identifies individual/family
 - Pertinent to the condition/criteria
- Specific examples for each type of documentation to follow



Written Letters/Referrals

- Official communication on letterhead or template
- Signed and dated (as appropriate)
- Additional standards depend on the specific criteria/condition of the Homeless Definition Category being used



Recorded Oral Statements

- By intake staff
 - Of 3rd party providing verification
 - Signed and dated by intake staff as true and complete
- ** Recommend standardized form for program
- Create clearly labeled sections for including relevant details and certifications



Recorded Intake Staff Observations

- Intake staff notes on their observations and assessments
- Signed and dated by intake staff as true and complete
- ** Recommend standardized form for program
 - Create clearly labeled sections for including relevant details and certifications



Individual/Head of Household Statement

- Written statements certified (signed and dated) as true and complete
 - Regulations specify when oral statements can be used
 - If self-certification must be verified:
 - Confirmation that certification was verified OR
 - Documented due diligence
 - Signed and dated
- ** Recommend standardized form for program**



Recorded Intake Staff Efforts (Due Diligence)

- Describe efforts to obtain third party documentation
 - May include phone logs, email correspondence, copies of certified letters, etc.
 - Details of outcome, including obstacles
 - Signed and dated by intake staff as true and complete
- ** Recommend standardized form for program



Examples of Acceptable Documentation



Examples of Acceptable Documentation

- **By Homeless Definition Categories:**
 - Category 1: Literally Homeless
 - Category 2: Imminent Risk of Homelessness
 - Category 3: Homeless Under Other Federal Statute
 - Category 4: Fleeing/Attempting to Flee DV



Category 1: Literally Homeless

If Unsheltered Homeless

- HUD's preferred order applies
 - Exception for providing emergency shelter, street outreach services, domestic violence
- Third Party –Written examples:
 - HMIS street outreach service record
 - Homeless Certification/Written Referral from local law enforcement or emergency medical service agencies



- Standards for system:
 - Retains auditable history of all entries
 - Prevents overrides or changes to dates entries are made
- Standard for verifying homeless status:
 - Dates of stay/services should be concurrent with application for assistance.



Certifications of Homelessness

- Standards for Homeless Certifications:
 - Confirm homeless status
 - Document any applicable criteria
- General standards for written letters/referrals
 - Official communication
 - Signed and dated by appropriate third party representative
- ** Recommend standardized form for program



Category 1: Literally Homeless

If In Shelter

- HUD's preferred order applies
- Third Party –Written examples
 - HMIS shelter stay record
 - Homeless Certification/Written Referral from shelter



If Exiting An Institution

Condition: Unsheltered OR in emergency shelter prior to entry

- HUD's preferred order applies
- Third Party –Written records available may include:
 - HMIS shelter stay/street outreach service record
 - Homeless Certification/Written Referral



Category 1: Literally Homeless

If Exiting An Institution (cont'd)

Condition: Length of stay is 90 days or less

- Appropriate documentation in preferred order:
 - Third Party –Written
 - Discharge paperwork
 - Written Referral
 - Third Party –Oral
 - Self-Certification & Due Diligence
- Documentation standard: must specify entry/exit dates or duration of stay



3 Conditions:

- 1) Housing Loss within 14 days
 - Documentation requirements vary by condition and type of housing
- 2) No subsequent residence
- 3) Lack of resources and support networks to obtain other housing



Category 2: Imminent Risk of Homelessness

Housing loss within 14 days

If tenants/homeowners

- Appropriate documentation in preferred order:
 - Third Party –Written:
 - Court order to leave OR
 - Other equivalent notice under State law



Category 2: Imminent Risk of Homelessness

Housing loss within 14 days (cont'd)

If in hotel/motel: lack of financial resources

- Self-Certification, supported by other documentation when practical

If in other housing situation (i.e., doubled-up)

- Self-certification, supported by
 - Third Party Verification OR
 - Due Diligence



Category 2: Imminent Risk of Homelessness

No subsequent residence

- Self-Certification, supported by other documentation when practical

Lack of resources & support networks to obtain other housing

- Self-Certification, supported by other documentation when practical

**** Recommend standardized assessment form**



3 Conditions:

- 1) Flight/Attempt to Flee DV
 - 2) No subsequent residence
 - 3) Lack of resource to obtain other housing
- Self-Certification requirements vary by type of provider determining Homeless status



If Victim Service Provider:

- Self-certification of all three conditions
 - Signed and dated by individual/head of household OR
 - Oral statement recorded by intake staff, signed and dated as true and complete by intake staff



Category 4: Fleeing/Attempting to Flee DV

If Non-Victim Service Provider:

- Self-certification of fleeing/attempt to flee DV by individual/head of household **AND, if no threat to safety,** supported by
 - Third Party written referral source from whom assistance was sought for DV, OR
 - Intake worker observation
 - Need only contain minimum amount of information necessary
 - Confirm household is fleeing/attempting to flee DV



If Non-Victim Service Provider:

- Self-certification of no subsequent residence, resources or support networks

**** Recommend standardized form**



Written Standards



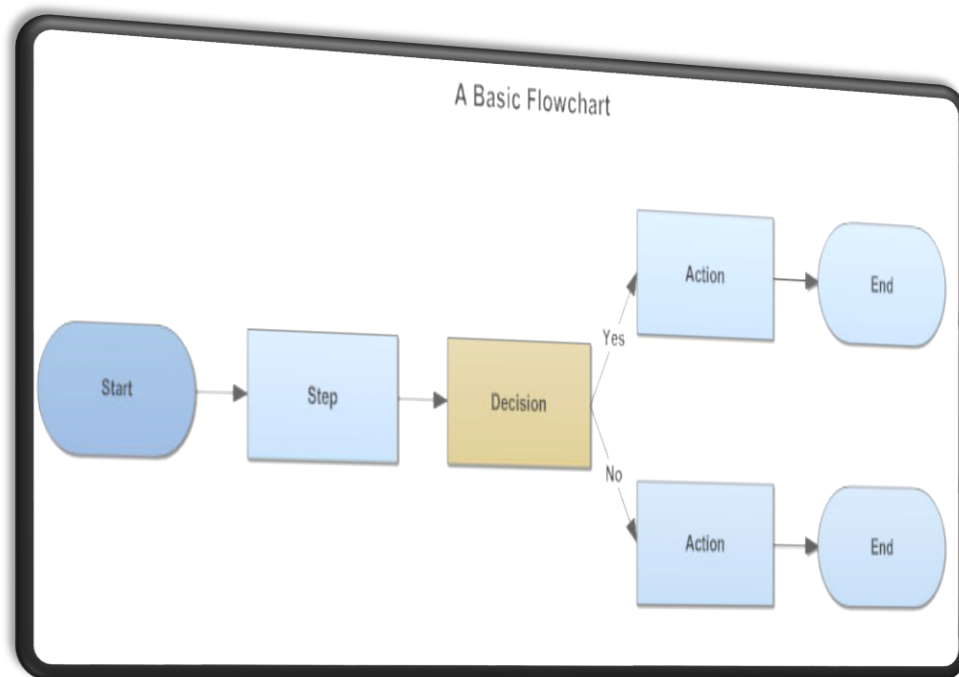
WRITTEN INTAKE POLICY

COC - 24 CFR 578.103(A)(3)

- **THE RECIPIENT MUST MAINTAIN AND FOLLOW WRITTEN INTAKE PROCEDURES**
- **THE PROCEDURES MUST ESTABLISH THE ORDER OF PRIORITY FOR OBTAINING HOMELESS DOCUMENTATION**



WRITTEN INTAKE POLICY



ORDER OF PRIORITY

- **THIRD-PARTY DOCUMENTATION**
- **INTAKE WORKER OBSERVATIONS**
- **CERTIFICATION FROM THE PERSON SEEKING ASSISTANCE**



WRITTEN INTAKE POLICY

RECORDKEEPING

- **DUE DILIGENCE**
- **TIME LAPSE**
- **CHECK-OFF FORMS NOT ACCEPTABLE**
- **SIGNED AND DATED ON LETTERHEAD**
- **COMPLETE PICTURE**





TERMINATION POLICY



COC - 24 CFR 578.91

- **FORMAL PROCESS**
- **DUE PROCESS OF LAW**
- **MOST SEVERE CASES**



TERMINATION POLICY

**THE REGULATIONS REQUIRE THE FOLLOWING
FOUR PROVISIONS**

- 1. PROVIDE THE PARTICIPANT WITH A COPY OF THE
POLICY PRIOR TO RECEIVING ASSISTANCE**
 - RULES/CAUSES**
- 2. WRITTEN NOTICE TO PARTICIPANT WITH THE
REASON FOR TERMINATION**





TERMINATION POLICY



THE REGULATIONS REQUIRE THE FOLLOWING FOUR PROVISIONS

3. A REQUEST/REVIEW OF THE DECISION

- **WRITTEN OR ORAL**
- **PERSON OTHER THAN THE DECISIONMAKER OR THEIR SUBORDINATES**

4. PROMPT WRITTEN NOTICE OF THE FINAL DECISION



CONFIDENTIALITY

24 CFR 578.103(B)

- **PROTECTED IDENTIFYING INFORMATION (PII) WILL BE KEPT SECURE AND CONFIDENTIAL**
- **ADDRESS OR LOCATION OF A FAMILY VIOLENCE PROJECT WILL NOT BE MADE PUBLIC**
- **ADDRESS OR LOCATION OF HOUSING OF PARTICIPANTS WILL NOT BE MADE PUBLIC**



RECORDKEEPING

24 CFR 578.103(A)

- **MUST ESTABLISH AND MAINTAIN STANDARD OPERATING PROCEDURES FOR ENSURING THAT COC FUNDS ARE USED IN ACCORDANCE WITH REGULATIONS**
- **MAINTAIN SUFFICIENT RECORDS**