

Continuum of Care (CoC) Training: Homeless Documentation

Definitions & Recordkeeping Requirements

March 10, 2021

HUD Definition of Homelessness

- HUD's definition of homelessness is organized into 4 categories
 - 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
- HUD also separately defines chronic homelessness

Four Categories of Homelessness

Category 1: Literally Homeless

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

- Has a primary nighttime residence that is a public or private place not meant for human habitation
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs) or;
- Is existing in an institution where (s)he 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

Category 1: Literally Homeless

RECORD KEEPING REQUIREMENTS

- Written observation by the outreach worker; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
- For individuals exiting an institution, one of the forms of evidence above and
 - Discharge paperwork or written/oral referral, or
 - Written record of intake worker's due diligence to obtain above evidence and certification individual that they exited institution

Category 2: Imminent Risk of Homelessness

DEFINITION: Individual or family who will immediately lose their primary nighttime residence, provided that:

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

Category 2: Imminent Risk of Homelessness

RECORD KEEPING REQUIREMENTS:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel -evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
- Certification that no subsequent residence has been identified; and
- Self certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing

Category 3: Homeless Under Other Federal Statutes (requires HUD approval – contact CPD Rep)

DEFINITION: Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under the other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
- Can be expected to continue such status for an extended period of time due to special needs or barriers

Category 3: Homeless Under Other Federal Statutes (requires HUD approval – contact CPD Rep)

RECORD KEEPING REQUIREMENTS:

- Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of no PH in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or 2 or more barriers

Category 4: Fleeing/Attempting to Flee Domestic Violence

DEFINITION: Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

Category 4: Fleeing/Attempting to Flee Domestic Violence

RECORD KEEPING REQUIREMENTS:

- For victim service providers:
 - An oral statement by the individual or head of household seeking assistance which states they are fleeing; they have no subsequent residence; and they lack resources
 - Statement must be documented by a self-certification or a certification by the intake worker.

Category 4: Fleeing/Attempting to Flee Domestic Violence

RECORD KEEPING REQUIREMENTS:

- For non-victim service providers:
 - Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Chronically Homeless Definition & Recordkeeping Requirements

Chronically Homeless

DEFINITION: An individual who:

- Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in emergency shelter continuously for at least one year or at least four separate occasions in the last 3 years
 - Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

Chronically Homeless

DEFINTION (continued): An individual who

- Can be diagnosed with one or more of the following conditions:
 - substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.
- Has 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 met all criteria in paragraph (1) prior to entering that facility; or

Chronically Homeless

DEFINITION (continued):

- 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 the criteria in paragraph 1 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Chronically Homeless

RECORD KEEPING REQUIREMENTS:

- Continuum of care program funds are required to maintain and follow written intake procedures to ensure compliance with the “chronically homeless” definition
 - Must establish the order of priority for obtaining evidence as:
 - (1) Third-party documentation
 - (2) Intake worker observations
 - (3) Certification from the individual seeking assistance

Monitoring Exhibit 29-1

Monitoring Exhibit 29-1

- Most common monitoring finding
 - Mandatory review for COC Program grants
 - Divided into 3 sections
 1. General recordkeeping requirements
 2. Specific recordkeeping requirements of the definition of homelessness
 3. Specific recordkeeping requirements for the definition of at-risk of homelessness
- [CPD Monitoring Handbook](#)