



# Northern Nevada CoC Eligibility Documentation Guide

## **HUD-Mandated Proof of Eligibility Requirements for Participants in CoC-Funded Housing Projects**

This document provides guidance on how to meet eligibility documentation requirements for HUD-funded CoC programs.

There are two types of housing resources available from the Northern Nevada Coordinated Entry System, Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH). RRH offers short-term rental assistance for typically no longer than a year while the household works to establish independent permanent housing and requires a lease to be in place. PSH offers permanent housing where the participant has a lease and offers supportive services like case management. RRH is intended to target those who just need shorter term support to move on to permanent housing while PSH targets those who have the longest history of homelessness in our community as well as a co-occurring disabling condition. RRH participants must meet HUD’s Categories 1, 2 or 4 under its homeless definition while PSH participants must meet HUD’s chronic homelessness definition which is defined in detail on pages 5-6.

CoC-funded projects must maintain all relevant eligibility documentation for their participants in accordance with HUD’s CoC file retention schedule while upholding client confidentiality.

### 1. Homelessness Definition

Before we cover the required documentation for establishing a participant’s eligibility for placement in a CoC-funded project, we’ll begin with a breakdown of HUD’s definition of homelessness which includes four (4) categories:

<b>HUD’s Homelessness Definition</b>		
<b>Homeless Definition Category #</b>	<b>Homeless Definition Category Name</b>	<b>Homeless Definition Category Detailed Definition</b>
Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> <li>(i) Has a primary nighttime residence that is a public or private place not meant for human habitation;</li> <li>(ii) 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); <u>or</u></li> <li>(iii) Is exiting 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</li> </ul>
Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that:

		<ul style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; and</li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing</li> </ul>
Category 3	<p>Homeless Under Other Federal Statutes</p> <p>[Per HUD, no CoC has yet been permitted to serve anyone under this category. Can be served by ESG programs.<sup>1</sup>]</p>	<p>(3) 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:</p> <ul style="list-style-type: none"> <li>(i) Are defined as homeless under the other listed federal statutes;</li> <li>(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;</li> <li>(iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <b>and</b></li> <li>(iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.</li> </ul>
Category 4	Fleeing/ Attempting to Flee Domestic Violence	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, domestic violence</li> <li>(ii) Has no other residence; <b>and</b></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing</li> </ul>

## 2. Homelessness Documentation Requirements

There are various ways to provide documented proof of homelessness. Here is a break-down of record-keeping requirements for demonstrating CoC project eligibility for each of the four categories of homelessness.

HUD's Homelessness Eligibility Documentation Requirements <sup>2</sup>		
Homeless Definition Category #	Homeless Definition Category Name	Acceptable Options for Documenting Proof of Eligibility
Category 1	Literally Homeless	<ul style="list-style-type: none"> <li>• Written observation by the outreach worker; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> </ul>

<sup>1</sup> <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/category-3/>

<sup>2</sup> [At a Glance Criteria and Recordkeeping Requirements for Definition of Homeless \(hudexchange.info\)](#)

		<ul style="list-style-type: none"> <li>• Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter;</li> <li>• For individuals exiting an institution – one of the forms of evidence above <b>and</b>: <ul style="list-style-type: none"> <li>○ Discharge paperwork or written/oral referral, <u>or</u></li> <li>○ Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution.</li> </ul> </li> </ul>
Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> <li>• A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>• For the individual and families leaving a hotel or motel – evidence that they lack financial resources to stay; <u>or</u></li> <li>• A documented and verified oral statement; <b>and</b> <ul style="list-style-type: none"> <li>○ Certification that no subsequent residence has been identified; <b>and</b> <ul style="list-style-type: none"> <li>▪ Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.</li> </ul> </li> </ul> </li> </ul>
Category 3	Homeless Under Other Federal Statutes	<ul style="list-style-type: none"> <li>• 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; <b>and</b> <ul style="list-style-type: none"> <li>○ Certification of no Permanent Housing (PH) in the last 60 days; <b>and</b></li> <li>○ Certification by the individual or head of household, and any available supporting documentation, that they have moved two or more times in the past 60 days; <b>and</b></li> <li>○ Documentation of special needs or two (2) or more barriers.</li> </ul> </li> </ul>
Category 4	Fleeing/ Attempting to Flee Domestic Violence	<p><u>For Victim Service Providers:</u></p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><u>For Non-Victim Service Providers:</u></p>

		<ul style="list-style-type: none"> <li>• 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; <b>and</b> <ul style="list-style-type: none"> <li>○ Certification by the individual or head of household that no subsequent residence has been identified; <b>and</b></li> <li>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.</li> </ul> </li> </ul>
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### 3. Guidance for Victim Service Providers (VSP) Documenting Homelessness for Domestic Violence Survivors

The Violence Against Women Act (VAWA) was reauthorized in 2022 and updated the definition for domestic violence which now includes any felony or misdemeanor crimes committed under the family or domestic violence laws of the jurisdiction receiving grant funding. Moreover, the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by any one of the following:

- (1) a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- (2) a person who is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- (3) a person who shares a child in common with the victim; or
- (4) a person who commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.<sup>3</sup> It is important to note that VAWA applies to all victims of domestic violence despite the gendered language associated with the name of the Act

HUD will be working to bring their definition for Category 4 homelessness into alignment with the expanded definition of domestic violence included in VAWA 2022. They have directed CoCs to adopt the language and provisions included in VAWA 2022 now. Documentation options for VSPs serving survivors of domestic violence are included on the next page.

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<sup>3</sup> [Federal Register :: The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs](#)

Options for Documenting Domestic Violence under HUD’s Category 4 Homelessness <sup>4</sup>	
Documentation of the Original Incidence	Documentation of the Reasonable Belief of Imminent Threat of Further Domestic Violence
<ul style="list-style-type: none"> <li>• May be written observation of the housing or service provider;</li> <li>• a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance;</li> <li>• medical or dental records;</li> <li>• court records or law enforcement records;</li> <li>• or written certification by the program participant to whom the violence occurred or by the head of household.</li> </ul>	<ul style="list-style-type: none"> <li>• Includes threats from a third-party, such as a friend or family member of the perpetrator of the violence.</li> <li>• May be written observation by the housing or service provider;</li> <li>• a letter or other documentation from victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance;</li> <li>• Current restraining order or recent court order or other court records; law enforcement report or records;</li> <li>• Communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts;</li> <li>• or a written certification by the program participant to whom the violence occurred or the head of household.</li> </ul>

#### 4. Chronic Homelessness Definition

In order to be eligible for Permanent Supportive Housing (PSH), a participant must demonstrate that they meet HUD’s chronic homelessness definition.

**HUD’s chronic homelessness eligibility requirement for PSH placement has two parts:**

1. demonstrate either 12 consecutive months of homelessness, or more than four (4+) occasions of homelessness totaling 12 months over three years (may include institution stays of <90 days), **and**
2. Provide proof of a disabling condition.

HUD’s Chronic Homelessness Definition <sup>5</sup>
<ul style="list-style-type: none"> <li>• A homeless individual with a disability as defined in section 401(9) of the McKinney-Vento Assistance Act (42 U.S.C. 11360(9)), who: <ul style="list-style-type: none"> <li>○ Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter, and</li> </ul> </li> </ul>

<sup>4</sup> HUD San Francisco CPD Presentation “CoC Program Management Best Practices,” delivered in September 2023 by Jadzia Hardeman, MSW and Joshua Easterly, MPA.

<sup>5</sup> [CoC and ESG Homeless Eligibility - Recordkeeping Requirements - HUD Exchange](#)

- Has been homeless and living as described for at least 12 months\* or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described.
- An individual who has been residing in an institutional care facility for less, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility\*\*;  
or
- 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 of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

\*A “break” in homeless is considered to be 7 or more nights.

\*\*An individual residing in an institutional care facility does not constitute a break in homelessness.

#### 4.a. Disability Definition

In addition to demonstrating a person’s history of homelessness of being a year or longer, providers must also provide documentation of a disability.

##### **HUD’s Disability Definition<sup>6</sup>**

The term homeless individual with a disability<sup>1</sup> means an individual who is homeless, as defined in [§ 103](#) of the McKinney-Vento Homeless Assistance Act, and has a disability that:

- Is expected to be long-continuing or of indefinite duration;
- Substantially impedes the individual's ability to live independently;
- Could be improved by the provision of more suitable housing conditions; and
- Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury?
- Is a developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 ([42 U.S.C. 15002](#)); or
- Is the disease of acquired immunodeficiency syndrome or any condition arising from the etiologic agency for acquired immunodeficiency syndrome.

<sup>6</sup> [CoC and ESG Homeless Eligibility - Recordkeeping Requirements - HUD Exchange](#)

## 5. Chronic Homelessness Documentation Requirements

There are a couple of options for demonstrating a person’s eligibility as someone experiencing chronic homelessness. Those are:

HUD’s Chronic Homelessness Eligibility Documentation Requirements <sup>7</sup>		
Situation	Documentation of Homelessness	Documentation of Disability
Household is Chronically Homeless  (12 Consecutive Months)	<ul style="list-style-type: none"> <li>• HMIS record or record from a comparable database; <u>or</u></li> <li>• Written observation by an outreach worker of the conditions where the individual was living; <u>or</u></li> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker’s documentation of the living situation and the steps taken to obtain the evidence listed above.</li> </ul> <p>If the head of household is currently staying in an institution where they have been for less than 90 days (and were in a shelter/street/safe haven immediately prior) their institutional stay can be documented by:</p> <ul style="list-style-type: none"> <li>• Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of program participant's residence, <u>or</u></li> <li>• Where evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker’s documentation of the living situation and the steps taken to obtain the evidence listed above.</li> </ul>	<p>Documentation of the head of household’s disability, including:</p> <ul style="list-style-type: none"> <li>• Written verification of the disability from professional licensed by the state to diagnose and treat the disability;</li> <li>• Written verification from the Social Security Administration;</li> <li>• The receipt of a disability check (e.g. SSDI check or Veteran Disability Compensation);</li> <li>• Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by evidence above; <u>or</u></li> <li>• Other documentation approved by HUD.</li> </ul>
Household is Chronically Homeless	<ul style="list-style-type: none"> <li>• HMIS record or record from a comparable database; <u>or</u></li> <li>• Written observation by an outreach worker of the conditions where the individual was living; <u>or</u></li> </ul>	<p>Documentation of the head of household’s disability, including:</p> <ul style="list-style-type: none"> <li>• Written verification of the disability from</li> </ul>

<sup>7</sup> [CoC and ESG Homeless Eligibility - Recordkeeping Requirements - HUD Exchange](#)

<p>(4+ Occasions totaling 12 months over three years) *</p> <p><i>*May include institution stays of &lt;90 days</i></p>	<ul style="list-style-type: none"> <li>• Written referral by another housing or service provider; <u>or</u></li> <li>• Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of program participant's residence (for institutional stays of less than 90 days)</li> <li>• Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above.</li> </ul> <p><i>* Each separate occasion MUST be documented (minimum of three breaks). 100% of the breaks can be documented by self-report.</i></p>	<p>professional licensed by the state to diagnose and treat the disability;</p> <ul style="list-style-type: none"> <li>• Written verification from the Social Security Administration;</li> <li>• The receipt of a disability check (e.g. SSDI check or Veteran Disability Compensation);</li> <li>• Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by evidence above; <u>or</u></li> <li>• Other documentation approved by HUD.</li> </ul>
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## 6. Documenting Breaks in Homelessness

Per HUD's Documentation Standards for Chronic Homelessness<sup>8</sup>, all occasions of homelessness must be fully documented. Breaks in homelessness may be self-reported, and each project is allowed some flexibility in the type of documentation it can accept to verify a household's eligibility for placement into a HUD-funded housing project.

## 7. Breakdown of Certification Types Allowed per HUD-funded PSH Project

Participants may self-certify their history of homelessness if the individual seeking assistance can describe how they meet the definition of chronic homelessness and is accompanied by their intake worker's documentation of the living situation and the steps taken to obtain evidence to support it. Listed below is a breakdown of the mix of 3<sup>rd</sup> party documentation and self-certification a single project can use to provide sufficient documentation that all households are eligible to be served by the project.

Remember that for each project:

- 100% of households served can use self-certification for 3 months of their 12 months,
- 75% of households served need to use 3<sup>rd</sup> Party documentation for 9 months of their 12 months, and
- 25% of households served can use self-certification as documentation for any and all months.

<sup>8</sup> [Flowchart of HUD's Definition of Chronic Homelessness \(hudexchange.info\)](https://www.hudexchange.info)



For example, a project serving 20 households of single adults would have sufficient documentation that all clients being served by their project are eligible for those resources, per HUD:

- All 20 individuals could use self-certification to document their homelessness for 3 months of their 12 months,
- 15 of the 20 individuals would need 3<sup>rd</sup> party documentation to certify 9 months of their required 12 months minimum of homelessness,
- 5 of the 20 individuals could use self-certification to document their homelessness for any and all months of the 12-month minimum.