|  |
| --- |
| Guide for Review of S+C Homeless Determination/Recordkeeping Requirements |
| **Name of Recipient:**       |
| **Name of Subrecipient(s):** |
| **Grant Number:**  |
| **Project Reviewed:** |
| **Staff Consulted:** |
| **Name(s) of Reviewer(s)** |       | **Date** |       |

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must select “NO” in response to the question and make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a **"finding.**"

# Instructions: This is a MANDATORY review for Shelter Plus Care (S+C) Program projects funded in the FY 2011 Continuum of Care (CoC) Homeless Assistance Grants Competition. This Exhibit is divided into two sections: General Recordkeeping Requirements; and Detailed Recordkeeping Requirements for Individuals and Families Qualifying Under the Homeless Definition. It is intended to be used to determine whether the appropriate documentation has been maintained by a recipient/subrecipient and is designed to augment the review of the recipient’s projects to determine whether program participants’ eligibility has been adequately documented in terms of their homeless status upon entry into the program. This Exhibit is not intended to determine program participant eligibility. To determine whether an individual or family is eligible for the project being monitored (e.g., a Samaritan Housing Initiative project), the HUD reviewer must review the S+C program regulations and any related Notices (e.g., the Notice of Funding Availability), grant agreements, field office instructions, or memorandums.

To monitor this area:

1. Request a listing from the Homeless Management Information System of project program participants (current and former), including their entry dates.
2. Select a random sample from both current and former program participants (use identifiers other than program participant names, i.e., initials, case file numbers, apartment numbers, to identify program participants).
3. Review these program participant files to complete the questions in this Exhibit, supplemented by recipient staff interviews.

The HUD reviewer is responsible for determining whether sufficient supporting documentation is included in, or is missing from, the relevant program participant files to support conclusions, including any Finding(s) and/or Concern(s) noted in the final monitoring report.

**Questions:**

A.GENERAL RECORDKEEPING REQUIREMENTS

1.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records demonstrate that the recipient had written intake procedures in place to ensure that program participant documentation of homeless status is maintained in accordance with the program requirements?[24 CFR 582.301(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

2.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records demonstrate that the written intake procedures require obtaining documentation at project intake of the evidence relied upon to establish and verify homeless status? [24 CFR 582.301(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

3.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the records demonstrate that the recipient/subrecipient followed the written intake procedures?[24 CFR 582.301(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

4.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Do the recipient’s/subrecipient’s written procedures establish the order of priority for obtaining evidence of homelessness as: (1) third-party documentation; (2) intake worker observations; and (3) self-certification? [24 CFR 582.301(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

5.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| If the recipient/subrecipient is using HMIS or a comparable database as evidence of program participants’ homeless status, does the HMIS or comparable database retain an auditable history of all entries, including identification of the person who entered the data, the date of entry, and the change made, and does the HMIS prevent overrides or changes of the dates on which entries are made? NOTE: Recipients/subrecipients are not required to use their HMIS as evidence of homeless status but, if they do, the HMIS must also meet these requirements. The HUD reviewer can determine whether the HMIS was used by asking the recipient or subrecipient or by reviewing the case file and identifying whether HMIS printed records were included in the record.[24 CFR 582.301(b)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

6.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Does a review of program participant files confirm that there is acceptable evidence of the qualifying individual’s disability? The requirements of documenting disability are:1. written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long continuing or of indefinite duration and substantially impedes the individual’s ability to live independently;
2. written verification from the Social Security Administration;
3. the receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);
4. intake staff-recorded observation of disability that, no later than 45 days of the application for assistance, is confirmed and accompanied by evidence in paragraph 24 CFR 582.301(c)(1), (2), (3), or (4); or
5. other documentation approved by HUD.

[24 CFR 582.301(c)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

B. DETAILED RECORDKEEPING REQUIREMENTS FOR INDIVIDUALS AND FAMILIES QUALIFYING UNDER THE HOMELESS DEFINITION

7. PARAGRAPH 1 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For program participants who qualified as homeless because their primary nighttime residence was a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground, or because they were living in a supervised shelter designed to provide temporary living arrangements, does a review of program participant files include one of the following:1. a written referral by another housing or service provider;
2. a printed record from HMIS or a comparable database used by a victim service or legal service provider;
3. a written observation by an outreach worker of the conditions where the individual or family was living; or
4. a written certification by the individual or head of household seeking assistance?

[24 CFR 582.301(b)(1)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

8. PARAGRAPH 1 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, does a review of program participant files confirm that they were in the institution 90 days or less as evidenced by:1. discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution, or
2. a written record of the intake worker’s due diligence in attempting to obtain the information above and a written certification by the individual seeking assistance that stated he or she is exiting (or has just exited) the institution where he or she resided for 90 days or less?

NOTE: Intake workers must document the content of oral statements. Where the intake worker is unable to contact an appropriate official, the intake worker must document his/her due diligence in attempting to obtain a statement from the institution.[24 CFR 582.301(b)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

9. PARAGRAPH 1 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, does a review of program participant files confirm that program participant resided in a shelter or place not meant for human habitation immediately **prior to entering the institution,** as evidenced by: 1. a written referral by another housing or service provider;
2. a printed record from HMIS or another comparable database used by victim service providers or legal service providers;
3. a written observation by an outreach worker of the conditions where the individual or family was living; or
4. written certification by the individual or head of household seeking assistance?

[24 CFR 582.301(b)(2)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

10. PARAGRAPH 2 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For program participants who qualified under paragraph (2) of the homeless definition in 24 CFR 582.5, does a review of program participant files contain the following evidence that program participants would have **lost their primary nighttime residence (**including housing they own, rent, or share with others) according to one of the following:1. a court order resulting from an eviction action notifying the individual or family that they must leave within 14 days of the date of their application for homeless assistance, or the equivalent notice under state law, a Notice to Quit, or a Notice to Terminate issued under state law;
2. if the primary nighttime residence was a hotel or motel room not paid for by federal, state, or local government programs for low-income program participants or by charitable organizations, evidence that the individual or family lacked the resources necessary to reside there for more than 14 days from the date of application for homeless assistance; or
3. an oral statement by the individual or head of household seeking assistance that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days from the date of application for homeless assistance? The statement must be documented by the intake worker. Also, the oral statement was found credible by one of the following:
* a written certification by the owner or renter of the housing or the intake worker’s documentation of the owner or renter’s oral statement, or
* if the owner or renter of the housing cannot be reached, a written description and certification of the intake worker’s due diligence in contacting the owner or renter and a written certification by the head of household seeking the assistance that their statement is true and complete.

[24 CFR 582.301(b)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

11. PARAGRAPH 2 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For program participants who qualified under paragraph (2) of the homeless definition in 24 CFR 582.5, does a review of program participant files contain:1. certification from the individual or head of household that no subsequent residence has been identified; and
2. certification or other written documentation that the individual or family lacks the resources or support networks to obtain other permanent housing?

[24 CFR 582.301(b)(3)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

12. PARAGRAPH 3 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For youth and families qualifying under paragraph (3) of the homeless definition in 24 CFR 582.5, does a review of the program participant files confirm that the unaccompanied youth or family with children and youth meet the homeless definition of another federal statute as evidenced by a certification of homeless status signed by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under that statute?[24 CFR 582.301(b)(4)(i)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

13. PARAGRAPH 3 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 582.5, does a review of program participant files confirm that the program participants did not have a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance, as evidenced by the following:1. written certification by the head of household seeking assistance, or
2. written observation by an outreach worker,
3. or referral by a housing or service provider?

[24 CFR 582.301(b)(4)(ii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

14. PARAGRAPH 3 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 582.5, does a review of program participant files indicate that each program participant’s records contain a written self-certification that the program participant moved two or more times during the 60-day period immediately before the program participant applied for homeless assistance AND one or more of the following kinds of documentation, as applicable, to support the self-certification:1. recorded statements or records obtained from each owner or renter of housing; provider of shelter or housing; or social worker, case worker; or other appropriate official of a hospital or institution in which the individual or family resided;
2. a written record of the intake worker’s due diligence in attempting to obtain the above records;
3. where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, written self-certification that they were fleeing that situation and they resided at that address?

[24 CFR 582.301(b)(4)(iii)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

15. PARAGRAPH 3 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 582.5, does a review of program participant files confirm that the program participants’ persistent instability was likely to continue for an extended period of time because of: chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or dating violence or childhood abuse; the presence of a child or youth with a disability; two or more barriers to employment (including lack of high school degree or GED; illiteracy; low English proficiency; a history of incarceration; or detention for criminal activity; and/or a history of unstable employment) as evidenced by:1. for chronic disabilities, chronic physical health or mental health conditions, and substance addiction – a written diagnosis from a professional who is licensed by the state to diagnose or treat those conditions ; or
2. for barriers to employment – employment records, literacy or English proficiency tests, department of corrections records; or
3. any other reasonable documentation of any of the conditions in the criteria?

[24 CFR 582.301(b)(4)(iv)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

16. PARAGRAPH 4 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where the program participant qualified under paragraph (4) of the definition of homeless in 24 CFR 582.5 and **was served by a victim service provider**, do the records show that either the program participant or the intake worker certified in writing that the individual or head of household made an oral statement that the program participant: 1. was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault or stalking, or other dangerous or life-threatening conditions that relate to violence;
2. lacked the resources or support networks necessary to obtain other permanent housing; and
3. had no other subsequent residence identified?

[24 CFR 582.301(b)(5)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |

17. PARAGRAPH 4 – HOMELESS DEFINITION

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Where the program participant qualified under paragraph (4) of the definition of homeless and **was served by an organization that is not a victim service provider**, do the records contain the required documentation and support for the program participant’s oral statement that the individual or family:1. was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence;
2. lacked the resources or support networks needed to obtain other permanent housing; and
3. had no other subsequent residence identified?

NOTE: The documentation of the program participant’s oral statement must include:1. a written certification by the head of household that the oral statement is true and complete; and
2. where the health and safety of the program participant would not have been jeopardized**,** by a written observation of the intake worker or a written referral by a housing or service provider, legal assistance provider, social worker, health-care provider, law enforcement agency, pastoral counselor, or any other organization from whom the program participant had sought assistance for domestic violence, dating violence, sexual assault, or stalking. (The written referral or observation need only include the minimum amount of information required to document that the individual or family is fleeing domestic violence, dating violence, sexual assault or stalking.)

[24 CFR 582.301(b)(5)] |

|  |  |  |
| --- | --- | --- |
| [ ]  | [ ]  | [ ]  |
| **Yes** | **No** | **N/A** |

 |
| **Describe Basis for Conclusion:** |
|       |