Determining and documenting eligibility for HUD assisted homeless projects is required to ensure compliance with HUD’s homeless definition. HUD has established documentation standards to assure consistency and accuracy in documentation. Eligibility must be based on homeless status at intake; intake is the time the individual or family enters the project and begins receiving assistance under the grant program.

Complete eligibility documentation will include the following:

1. Verification of Homelessness Form
2. Documentation of Homelessness (in order of preference)
   1. Third-party verification
   2. Intake worker observation (If third-party could not be obtain and MUST include Due Diligence)
   3. Self-Certification (MUST have WIBOS Self-Certification form filled out and Due Diligence form)
3. Chronic Homelessness documentation if applicable (MUST include timeline of chronicity and disability documentation should be obtained by 45 days after enrollment)

**Verification of Homelessness Form**

1. Staff should assist each individual or family in filling out the Verification of Homelessness form.
2. All individuals and families enrolled into HUD COC funded projects should be Category 1 or Category 4 homeless.
3. Category 2 homeless verification is for shelters and prevention programs. (Please see category 2 homeless information on page 3 of this document)
4. Category 3 homeless verification is for those homeless under other Federal statutes. (Please see category 3 homeless information on pages 3-4 of this document)
5. Every file must contain the Verification of Homelessness information.
6. Supporting documentation must be attached (HMIS Record, Third-Party written verification, Intake Worker observation, Self-Certification, etc.)

**Category 1 Homeless: Literally Homeless**

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

1. An individual or family with a primary nighttime residence that is 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;
2. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (emergency shelter, hotel/motel paid for by charitable organization\*\* or government programs for low income individuals); or
3. An individual who is exiting an institution where he or she 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.

\*\*A charitable organization is a type of non-profit organization whose primary objectives are philanthropy and social well-being. Examples of charitable organizations can include educational institutions, religious groups and churches, non-profit agencies, volunteer associations, The Red Cross. This could also include government entities such as Police or Sheriff’s department, Department of Corrections, Probation and Parole, etc.

**Category 4 Homeless:**

Any individual or family who:

1. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence, including
   * Trading sex for housing
   * Trafficking
   * Physical abuse
   * Violence (or perceived threat of violence) because of the youth’s sexual orientation;
2. Has no other residence; and
3. Lacks the resources or support networks, e.g., family, friends, and faith based or other social networks, to obtain other permanent housing.

**Documenting Homelessness**

HUDs general documentation standards apply to all documentation types. All documentation must:

1. Identify the entity or party needing assistance (example: agency requesting documentation)
2. Identify the individual or family needing assistance
3. Provide sufficient detail regarding the specific condition or criterion being documented. (Where individual and family has been staying, for how long, and how long services have been provided by outreach person or agency)

The following is HUD’s preferred order for homelessness verification:

1. Third-party documentation
2. Intake worker observations
3. Self-Certification from the person seeking services

**Third-Party Documentation**

Third-party documentation must conform to the general standards in addition to meeting requirements for documenting a particular category of homelessness. All documentation should show it is coming from an appropriate party and provide information about the households current living situation.

* 1. Source documentation from third-party. Examples include HMIS (or comparable system) CoC [FAQ 2757](https://www.hudexchange.info/faqs/2757/how-can-a-record-from-hmis-or-a-comparable-database-count-as-documentation/), discharge paperwork from institution that includes dates
  2. Written verification – all written third-party documentation should meet the following requirements:
     1. Be issued on third-party letterhead; come from an agency email address; or be a statement receipt, or form (exception: information coming from HMIS, or a letter from a reliable community member).
     2. Be signed and dated by third-party
  3. Oral verification – all oral verification should meet the following requirements:
     1. Identify the third-party providing the oral verification and date oral verification was received.
     2. Identify the intake worker recording he oral statement.
     3. Include signed and dated certification by the intake worker as true and complete.

\*\*Exception – For Category 4, third-party notification is not recommended if it will jeopardize the safety of the individual or family.

Additional examples of third-party documentation:

* A written observation by an outreach or intake worker of encounters with the individual or head of household that includes a description of the conditions where the individual or head of household was living or is currently living [FAQ 2758](https://www.hudexchange.info/faqs/2758/how-can-encounters-with-the-individual-or-head-of-household-by-the-outreach/) (also includes when an intake worker CANNOT be used as third-party documentation);
* A written observation by a community member that has observed where the individual or head of household was living or is currently living CoC [FAQ 2759](https://www.hudexchange.info/faqs/2759/can-a-community-member-such-as-a-shopkeeper-or-neighborhood-resident/); and
* A written referral by another housing or service provider CoC [FAQ 2760](https://www.hudexchange.info/faqs/2760/can-housing-or-service-providers-such-as-emergency-shelter-staff-members/).

**Intake Worker Observation**

In the event staff has done their due diligence to obtain third-party documentation and were unable to confirm, staff conducting intake may record their observations as a form of verification. Intake Worker Observation must be on Agency Letterhead and clearly articulate to the best of their knowledge and based on their professional judgment, that the individual or head of household was residing in a place not meant for human habitation, or in an emergency shelter, at the time of intake. It is important to remember that the “Due Diligence” section must be filled out when using intake worker observation as a form of documentation.

**Documentation of Due Diligence**

On this form, Intake Workers will describe efforts to obtain third-party verification, including the outcome of the efforts and obstacles. Users should document all efforts to collect third-party verification, the Applicant’s current living situation, and why the attempts to collect third-party documentation were unsuccessful.

**Staff should record all contacts with potential third-party contacts that have been identified. This includes phone calls and/or messages left, email correspondence, copies of letters sent and the number of attempts to contact each potential third-party.**

**Self-Certification**

Self-Certification of Homelessness Forms must always be accompanied by the Documentation of Due Diligence. The exception is if someone is unsheltered and seeking HUD funded emergency shelter services, then self-certification is sufficient, and you do not need to make an effort to document due diligence.

As a last resort to establish eligibility after all efforts to collect third-party verifications have been exhausted, HUD allows households to provide written statements that are signed and dated in lieu of third-party verification.

* Self-certifications should be completed by the applicant. If that presents an undue burden, intake staff may assist with completion, using the applicant’s own words.
* All Self-Certification of Homelessness Forms must be signed by the applicant and intake staff as a witness.

**Category 2 Homeless: Imminent Risk of Homelessness**

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
2. No subsequent residence has been identified; and
3. The individual of family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

**Documentation for Category 2 Homelessness**

Category 2 is used by shelters and for prevention programs. The WIBOS “Verification of Homelessness” form has a section for documenting category 2. Documentation needed:

* A court order resulting from an eviction action notifying the individual or family that they must leave; or
* For individuals 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 lacks the financial resources and support necessary to obtain permanent housing.

**Category 3 Homeless: Homeless Under Other Federal Statutes**

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:

1. Are defined as homeless under the other listed federal statutes;
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
3. Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
4. Can be expected to continue in such status for an extended period of time due to special needs or barriers

**Documentation for Category 3 Homelessness**

This form is on the WIBOS website, “Verification of Homelessness Category 3 ONLY”. It is a separate form from the “Verification of Homelessness” form.

**NOTE: HUD must approve CoC Program funded projects to serve youth under Category 3. ESG funded projects do not require HUD approval.**

* Certification of homeless status by the non-profit, or state or local government entity, responsible for administering homeless assistance under other federal statutes, and
* Certification by the youth that they have not had a lease or other agreement for housing in the last 60 days with written documentation (e.g., from an outreach worker or homeless liaison) OR documentation of intake worker’s attempts to verify information, and
* Certification by the youth that they have had two or more moves in the last 60 days with written documentation OR documentation of intake worker’s attempts to verify information, and
* Documentation of special needs (e.g., copy of SSI check, third party verification, direct observation) or at least two barriers to employment

Resource: [HUD Guide to assist in determining homeless status of youth](https://files.hudexchange.info/resources/documents/Determining-Homeless-Status-of-Youth.pdf).