

6.5 CES Eligibility Documentation

PURPOSE

This policy ensures that all participants in Continuum of Care (CoC)-funded housing programs provide the necessary documentation to verify their eligibility, homelessness status, and any required conditions such as disability. The policy outlines the types of documentation required by HUD, the process for collecting and validating these documents, and the specific record-keeping requirements for chronic homelessness and clients fleeing domestic violence.

FORMS

APPENDIX	H	Verification of Homelessness (VOH) Form – Self Certification
APPENDIX	F	Verification of Homelessness (VOH) Form – Program/Facility Third Party
APPENDIX	G	Verification of Homelessness (VOH) Form – Unsheltered Third Party
APPENDIX	E	Verification of Disability (VOD) Form

POLICY

Participants in the CES must provide specific documentation to verify their eligibility, per HUD. The two main documents required are the Verification of Homelessness (VOH) and Verification of Disability (VOD). The policy also includes guidelines for documenting chronic homelessness and for clients fleeing domestic violence.

Verification of Homelessness (VOH)

- An HMIS record or a record from a comparable database.
- A written observation by an outreach worker of the client's living conditions.
- A written statement from another housing or service provider.
- A client certification, accompanied by the intake worker's documentation, if the above evidence cannot be obtained.

Verification of Disability (VOD)

- Written verification from a licensed professional.
- Written verification from the Social Security Administration.
- Receipt of a disability check.
- Intake staff-recorded observation of the disability, confirmed within 45 days by a professional.

For any documentation other than third-party verification, the case file must include evidence of due diligence to obtain third-party verification. All documents must be retained for at least five years.

Chronic Homeless Verification

- History of residing in a place not meant for human habitation, an emergency shelter, or a safe haven.
- Stays in institutions and breaks in homelessness of seven nights or more.
- Documentation should prioritize third-party evidence, with intake worker observation and client certification as secondary options.
- Accumulation of 12 months over the last 3 years.

Documentation for Clients Fleeing Domestic Violence

For Victim Service Providers (VSPs):

An oral statement from the client certifying they are fleeing domestic violence, have no subsequent residence, and lack resources, documented by self-certification or intake worker certification.

For non-VSPs:

An oral statement from the client, documented by self-certification or caseworker verification, with additional certification that no subsequent residence has been identified and the client lacks financial resources and support networks to obtain other housing.

This policy ensures that all required documentation is properly collected, validated, and maintained to support eligibility for CoC-funded housing programs and to comply with HUD guidelines.

KEY TAKE AWAYS

- **Required Documentation:** CoC-funded housing programs require two primary documents for participants: Verification of Homelessness (VOH) and Verification of Disability (VOD). VOH is used to assess a client’s homelessness status and duration, while VOD is required for Permanent Supportive Housing (PSH) programs to verify that the client or a household member has a qualifying disability.
- **Acceptable Forms of Documentation:** The policy details acceptable forms of documentation for both VOH and VOD, as well as the priority order for obtaining these documents as set by HUD. Third-party verification is preferred, but other forms of documentation may be used if necessary, provided that due diligence is demonstrated.
- **Chronic Homelessness Documentation:** For clients who meet the definition of chronically homeless, the policy outlines specific record-keeping requirements, including the documentation of homelessness history, institutional stays, and any breaks in homelessness. Third-party documentation is required for at least 9 of the 12 months of homelessness, with the remainder documented by client certification.
- **Domestic Violence Documentation:** The policy provides guidance on documenting homelessness for clients fleeing domestic violence, differentiating between requirements for Victim Service Providers (VSPs) and non-VSPs. In both cases, an oral statement by the client is required, with additional certification and documentation depending on the circumstances.
- **Record-Keeping Requirements:** All documentation must be kept for a minimum of five years, as per HUD guidance. The policy emphasizes the importance of maintaining accurate and complete records to ensure compliance with HUD requirements and to support the eligibility of participants for CoC-funded housing programs.