At Risk of Homelessness
Status & Income:
Recordkeeping Requirements
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Webinar Format

• Webinar will last approximately an hour
• Recording will be posted on the HUD’s
  Homelessness Resource Exchange
• Materials will be posted within one week of today
• Audience members are “muted” due to the high number of participants

Audio Issues During the Webinar

• For audio, please use the telephone, not your computer
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  – Logging off, then logging in again
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Submitting Questions

• During the webinar, use the “Questions” function in the “GoToWebinar” toolbar
• After the webinar, submit questions to HUD’s Virtual Help Desk
  – Program/System: Emergency Solutions Grants (ESG)
  – Topic: Program Requirements
  – Sub-topic: Assessment and Recordkeeping
• Reference At Risk of Homelessness Status & Income: Recordkeeping Requirements in your question

Context of Presentation

• Preceded by
  – Determining Homeless and At-Risk Status, Income, and Disability
  – Homeless Status: Recordkeeping Requirements
• Recording available on Homelessness Resource Exchange

Objectives of the Webinar

Webinar participants will be able to:
• Understand requirement to develop local policies and procedures for recordkeeping
• Incorporate and use HUD’s required order for documentation in policies & procedures
• Adopt and use documentation standards
• Identify acceptable documentation for each At Risk Definition Category
• Identify acceptable documentation for each type of income
At Risk of Homelessness Status and Income: Recordkeeping Requirements

1 Overview of Recordkeeping Requirement

Applicability of At Risk Requirements

- Applies to
  - Emergency Solutions Grants program (ESG)

- Does not apply to
  - Emergency Shelter Grants
  - HPRP
  - Supportive Housing Program (SHP)
  - Shelter Plus Care (S+C)
Applicability of Income Requirements

- Applies under ESG to
  - Category 1 of At Risk Definition
  - Homelessness Prevention component (at initial & every 3 months at re-certification)
  - Rapid Re-Housing component (at annual re-certification only)

Recordkeeping Requirements

Overview of Requirements

- Require recipients to develop and use policies & procedures for recordkeeping
- Specify the order for documentation
- Specify that documents must be sufficient to demonstrate compliance
- Provide examples of acceptable documentation by At Risk categories
- Provide examples of acceptable documentation for income

Poll Questions

1. Under ESG, income requirements are not applicable:

   a. When documenting At Risk status under Category 1
   b. At initial certification for Homelessness Prevention
   c. At re-certification for Homelessness Prevention
   d. At initial certification for Rapid Re-Housing
   e. At annual re-certification for Rapid Re-Housing
Policies and Procedures

At Risk Policies & Procedures

Written policies and procedures must

• Require intake staff to document
  – At intake/screening for eligibility
  – For ALL persons seeking assistance
  – Evidence relied upon to establish and verify At Risk of Homelessness status
• Be consistent with recordkeeping requirements & reflect HUD’s required order

Income Policies & Procedures

Written policies and procedures must

• Require intake staff to document income
  – When applicable
    • For At Risk Category 1: At intake/screening
    • For ESG HP: At intake/screening & every 3 months at re-certification
    • For ESG RRH: at annual re-certification
• Be consistent with recordkeeping requirements & reflect HUD’s required order
3 Order for Documentation

HUD’s required order:
1. Third Party
   – Source
   – Written
   – Oral
2. Intake Observations (NA to income)
3. Self-Certification

Tips for Policies and Procedures

• Adopt checklists that reflect required order
• Have staff check for existing documentation
  – E.g., HMIS records or discharge paperwork
• Create forms for tracking & documenting due diligence

Preferred Order for Documentation
2. Pick the documentation that is required by HUD, if available:
   a. Intake Observation
   b. Third Party – Source
   c. Self-Certification
   d. Third Party – Oral

3. Which of the following is a Third Party – Source document:
   a. Official Termination Notice
   b. Letter from Employer confirming termination
   c. Oral statement from Employer confirming termination

Standards for Documentation

• Adopt standards in policies and procedures
  – Strategy for addressing requirement that records must be sufficient

• General examples include,
  – Clearly identifies entity/party providing verification
  – Pertinent to and identifies individual/family
  – Pertinent to the condition/criteria

• Specific examples for each type of documentation to follow
Third Party – Source

Notices/Statements
• Official communication on letterhead or statement template
• Signed and dated (as appropriate)
• Additional standards depend on purpose
  • Examples:
    – Notices: eviction, job termination, etc.
    – Statements: Wage (paystub), Social Security, Bank Checking/Saving, etc.

Standards for Documentation

Third Party – Written

Written Letters/Referrals
• Official communication (issued on agency stationary or program template)
• Signed and dated by appropriate representative of third party
• Additional standards depend on purpose:
  – Housing history (eviction related details, living situation & length of stay details)
  – Economic hardship (letter citing inability to work or recent termination), etc.

Standards for Documentation

Third Party – Oral

Recorded Oral Statements
• By intake staff
• Of 3rd party providing verification
• Signed and dated by intake staff as true and complete

** Recommend standardized form for program
  – Create clearly labeled sections for including relevant details and certifications

Standards for Documentation
**Intake Observations**

**Recorded intake staff observations**
- Intake staff notes on their observations and assessments
- Signed and dated by intake staff as true and complete
- Not appropriate for documenting income

**Recommend standardized form for program**
- Create clearly labeled sections for including relevant details and certifications

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**Standards for Documentation**

**At Risk Self-Certification**

**Individual/Head of Household Statement**
- Written statements certified (signed and dated) as true and complete
  - Regulations specify when oral statements can be used
- If self-certification must be verified
  - Confirmation that certification was verified by intake staff OR
  - Documented due diligence
  - signed and dated

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**Income Self-Certification**

**Individual/Head of Household Statement**
- Written statement certified (signed and dated) as true and complete
- Representative of current income

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**Standards for Documentation**
Due Diligence

Recorded Intake Staff Efforts (Due Diligence)

- Describe efforts to obtain third party
  - phone logs, email correspondence, copies of certified letters etc.
- Details of outcome, including obstacles
- Signed and dated by intake staff as true and complete

** Recommend standardized form for program

Standards for Documentation

Poll Questions

True/False: Third Party Oral Statements recorded by Intake Staff must be certified as true and complete by Intake Staff.

True False

Standards for Documentation

At Risk of Homelessness Status: Examples of Acceptable Documentation
Examples of Acceptable Documentation

• By At Risk of Homelessness Definition
  Categories:
  Category 1: Individuals and Families
  At Risk
  Category 2: Homeless Children & Youth under
  Other Federal Statutes
  Category 3: Homeless Children & Youth
  under § 725(2) of McKinney-Vento

Category 1: Individuals & Families At Risk

3 conditions:
1. Income below 30% FMI/AMI
   - Will be covered under section dedicated to
     examples of acceptable documentation by
     income source
2. Insufficient financial resources or support
   networks to prevent homelessness
3. Meets 1 of 7 risks specified in ESG Interim
   Regulations

Condition 2: Lack of resources & support
networks to prevent homelessness

• Self-Certification, supported by other
documentation when practical
• Examples include termination notice,
  unemployment compensation statement, bank
  statement, health care/utility bill showing arrears
**Category 1: Individuals & Families At Risk**

**Condition 3: Meets 1 of 7 risks**
Requirement for documenting the 7 risks
- Self-Certification AND
- Supporting Documentation, as appropriate
  - Third Party –Source, Written, or Oral
  - Intake Observation OR
  - Documentation of Due Diligence

** Examples and standards for each risk outlined in slides 35 - 42

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**Category 1: Individuals & Families At Risk**

**Risk 1: Persistent housing instability (2 or more moves within 60 days) due to economic reasons**
- Housing history must demonstrate 2 or more moves within 60 days
  - Documentation source and type may include
    - HMIS records
    - Referral from housing/service provider
    - Letter from tenant/owner
  - Intake observation is not appropriate

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**Category 1: Individuals & Families At Risk**

**Risk 1: Persistent housing instability (2 or more moves within 60 days) due to economic reasons**
- Economic reasons may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.
  - Documentation source and type may include
    - Notice of termination
    - Health care bills indicating arrears
    - Utility bills indicating arrears
  - Intake observation is not appropriate

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**Category 1: Individuals & Families At Risk**

**Risk 2: Living in the home of another because of economic hardship**
- Housing must be in the home of another (i.e., doubled up)
  - Letter from tenant/homeowner
  - Intake observation may be appropriate
- Economic hardship may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.
  - Refer to economic reasons on slide 36

**Examples of Acceptable Documentation**

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**Category 1: Individuals & Families At Risk**

**Risk 3: Housing loss within 21 days**
- Notification to leave within 21 days must be written
  - Only third party – source/written is appropriate
  - If tenant/homeowner: eviction notice, court order to leave within 21 days
  - If living with another (doubled up): eviction letter from tenant/homeowner

**Examples of Acceptable Documentation**

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**Category 1: Individuals & Families At Risk**

**Risk 4: Living in a rented hotel or motel (cost is not covered by charitable org/gov program)**
- Housing must be in hotel/motel
  - Letter from hotel/motel manager
  - Intake observation
- Costs have not been covered by charitable organization or government program
  - Cancelled checks

**Examples of Acceptable Documentation**

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Category 1: Individuals & Families At Risk

Risk 5: Living in a severely over-crowded unit as defined by US Census Bureau

- Census Bureau Definition:
  - SRO or efficiency apt: more than 2 ppl
  - Larger housing: more than 1 1/2 ppl per room
- Must document # of rooms in unit AND # of individuals living in unit
  - Lease
  - Unit details from Tax Assessor’s Office
  - Intake observation

Example of Acceptable Documentation

Category 1: Individuals & Families At Risk

Risk 6: Exiting publicly funded institution or system of care

- Documenting discharge from health care facility, mental health facility, foster care or other youth facility or correction program
  - Discharge paperwork
  - Referral letter

Example of Acceptable Documentation

Category 1: Individuals & Families At Risk

Risk 7: Living in housing associated with instability & an increased risk of homelessness as described in approved Consolidated Plan

- Appropriate documentation depends on characteristics identified in Recipient's Approved Consolidated Plan
- Policies and procedures must establish documentation requirements in line with HUD’s required order

Example of Acceptable Documentation
**Category 2: Homeless Children & Youth**

**Defined under another Federal Statute**

- Verification of Homeless Status must be provided by agency administering applicable Federal program
  - Third Party – Written ONLY
  - Certification of homeless status (letter or standardized form)

**Examples of Acceptable Documentation**

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**Category 3: Homeless Children & Youth including Families/Guardians**

**Defined under § 725(2) of McKinney-Vento**

- Third Party – Written ONLY
  - Certification of homeless status
  - May be letter or referral (**recommend standardized Homeless Certification form**)
  - Provided by agency administering Federal program
  - Must confirm that family/guardian is residing with children/youth

**Examples of Acceptable Documentation**

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**Poll Questions**

What type of documentation is used to confirm that an unaccompanied youth is At Risk under Category 2 or Category 3?

- a. Third Party - Written
- b. Third Party - Oral
- c. Intake Observation
- d. Self-Certification
- e. All of the above

**Examples of Acceptable Documentation**

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Income: Examples of Acceptable Documentation

- Acceptable documentation for income limited to:
  - Third Party –Source,
  - Third Party –Written,
  - Third Party –Oral OR
  - Self Certification

** Intake Observation is not applicable

Income Inclusions

1. Earned Income
2. Self-Employment/Business Income
3. Interest and Dividend Income
4. Pension/Retirement Income
5. Armed Forces Income
6. Unemployment and Disability Income,
7. Public Assistance, including TANF
8. Alimony and Child Support
9. No Income Reported
Examples of Acceptable Documentation

1. Earned Income (Wages and Salary)
   - Payment statement
   - Statement of income from employer/source of income

2. Self-Employment/Business Income
   - Most recent Financial Statement

3. Interest and Dividend Income
   - Most recent interest or dividend income statement

4. Pension/Retirement Income
   - Most recent benefit notice, pension statement or other payment statement from pension provider

5. Armed Forces Income
   - Payment statement
   - Statement of income from government official/agency

6. Unemployment and Disability Income
   - Most recent benefit or disability income notice from SSI
   - Statement from SSI
Examples of Acceptable Documentation

7. Public Assistance, including TANF
   – Most recent benefit or income notice from public assistance administrator
   – Statement from public assistance administrator

8. Alimony and Child Support
   – Court Order
   – Most recent payment statement

Examples of Acceptable Documentation

9. No Income Reported
   – Self-certification

Webinar Evaluation

• You should now be able to:
  – Understand requirement to develop local policies and procedures for recordkeeping
  – Incorporate and use HUD’s required order for documentation in policies & procedures
  – Adopt and use documentation standards
  – Identify acceptable documentation for each At Risk Definition Category
  – Identify acceptable documentation for each type of income

• Please complete the on-line survey to rate how well this webinar met its objectives
Answers to Quiz Questions

Answers and Explanations for Quiz

- **Quiz 1:** Under ESG, income requirements are not applicable
  a) When documenting At Risk status under Category 1
  b) At initial certification for Homelessness Prevention
  c) At re-certification for Homelessness Prevention
  d) At initial certification for Rapid Re-Housing
  e) At annual re-certification for Rapid Re-Housing

  Answer is d) At initial certification for Rapid Re-Housing. Income must be determined and documented for At Risk status under Category 1, at initial certification and re-certification for Homelessness Prevention assistance and at annual re-certification for Rapid Re-Housing.

Answers and Explanations for Quiz

- **Quiz 2:** Pick the documentation that is required HUD, if available
  a) Intake Observation
  b) Third Party – Source
  c) Self-Certification
  d) Third Party – Oral

  b) Third Party – Source. Third party documentation is first in the priority order. Second is Intake Observation and then, third, is Self-Certification. However, third party documentation is tiered. Source documents are higher priority to Oral statements.
Answers and Explanations for Quiz

Quiz 3: Which of the following is a Third Party –Source document?
a) Official Termination Notice
b) Letter from Employer confirming termination
c) Recorded oral statement from Employer confirming termination

Answer is a) Official Termination Notice is source document. It has an independent purpose. It was not created for the sake of the program. Rather, it was created for the purposes of formally notifying employees of the decision to terminate their employment. This distinguishes Official Termination Notice as a source document. Letters generated by the employer to a program for the purpose of documenting termination are classified as Written documents because they were created for the program.

Answers and Explanations for Quiz

Quiz 4: True/False: Third Party Oral Statements recorded by Intake Staff must be certified as true and complete by Intake Staff.

Answer is True. The intake staff recording the oral statement must certify the recording is a true and complete reflection of the oral statement provided by the third party.

Answers and Explanations for Quiz

Quiz 5: What type of documentation is used to confirm that an unaccompanied youth is At Risk under Category 2 or Category 3?

a) Third Party –Written
b) Third Party –Oral
c) Intake Observation
d) Self-Certification
e) All of the above

Answer A. Third Party –Written verification provided by the agency administering the other Federal program is the only form of documentation that can be used to confirm Homeless Status under another Federal Statute.