



Homebase

ADVANCING SOLUTIONS TO HOMELESSNESS

May 18, 2026

CoC Eligibility and Documentation Training

Nick Large

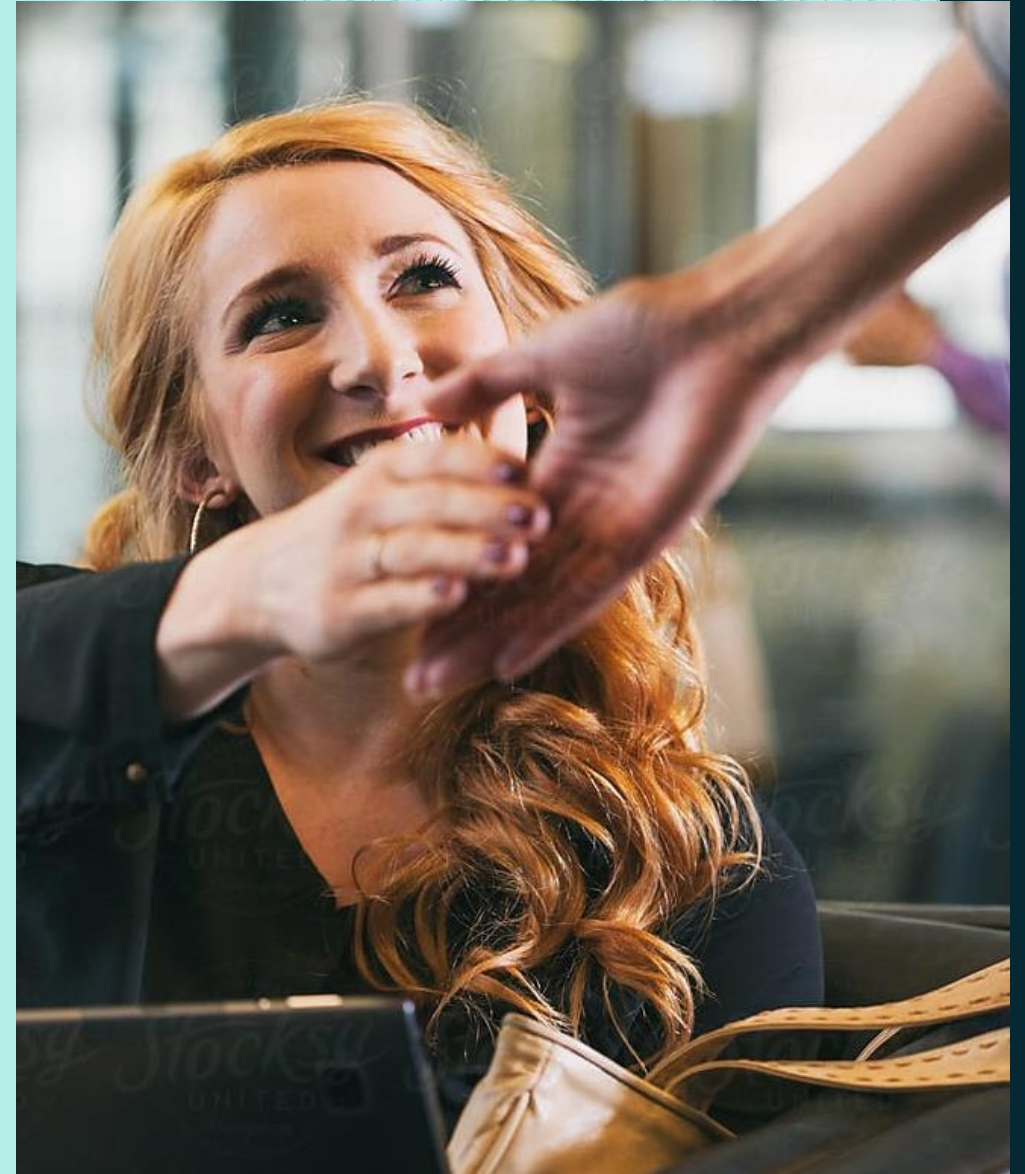
Kris Maun

Agenda

1. Warm Up!
2. CoC Program and Upcoming Changes
3. Participant Eligibility
4. Documenting Chronic Homelessness
5. Documenting Disability
6. Reporting Reminders
7. Peer Learning

Warm Up!

- Use the post it notes to write **one thing you are good at** for CoC eligibility and documentation.
- Use the post it notes to write **one thing you struggle with** for CoC eligibility and documentation.
- You can plus one (+1) what others have written!



CoC Program Context

The Continuum of Care Program (CoC)

- The CoC Program is THE federal program dedicated to addressing homelessness
- \$3-4 billion is competitively awarded annually to fund HMIS, CE, housing, and services (previously had to be tied to housing)
- A majority of CoC funding currently goes towards permanent supportive housing (PSH), but big changes are coming to the CoC programs that could impact target populations and eligibility
- Some outreach and services projects may soon use CoC funds and need to meet program requirements



U.S. Department of Housing and Urban Development

Community Planning and Development

FY 2024 and FY 2025 Continuum of Care Competition and Renewal or Replacement of Youth Homeless Demonstration Program Grants

FR-6800-N-25

08/29/2025

New Project Types

Project types prioritized by HUD in the 2025 NOFO

Support Services Only (SSO)

- Funds a variety of services with emphasis on promoting exits to housing and increasing employment income
- Grant recipient may not also provide housing assistance

Street Outreach (technically also SSO)

- Targeting unsheltered households and those who do not traditionally engage with services
- Can fund a variety of SSO activities

Transitional Housing (TH)

- Can fund time-limited housing assistance and supportive services
- Referrals must come from coordinated entry
- Service participation requirements

Why is This Important?

The NOFO has a big impact on eligibility

In addition to HUD's definitions of homelessness, eligibility for CoC projects comes from:

1. **The project type** – Some project types limit who is eligible to be enrolled, for example PSH
2. **Annual funding competition rules** – Through the NOFO, HUD can further limit CoC funds, for example DV bonus funds
3. **Most recent grant agreement** – Upcoming grant agreements might try to limit or change populations of focus



Participant Eligibility

Key Eligibility and Documentation Concepts

- **Homeless Categories**

There are four main categories under which households are considered “homeless”

- **Documentation varies**

Specific documentation rules apply to each of the different categories of homelessness

- **3rd party documentation is key**

Although HUD allows self-certification of homelessness in some circumstances, 3rd party documentation is always preferred

Defining Homelessness

HUD Defined Categories of Homelessness

<p>Category 1: Literal Homeless</p> <p>Individual or family who lacks a fixed, regular, and adequate nighttime residence.</p>	<p>Category 2: Imminent Risk of Homelessness</p> <p>An individual or family who will imminently lose their primary nighttime residence.</p>	<p>Category 3: Under Other Federal Statutes</p> <p>Unaccompanied youth under 25, or families with Category 3 children and youth, who do not otherwise qualify as homeless</p>	<p>Category 4: Fleeing Domestic Violence</p> <p>Fleeing or attempting to flee domestic violence, has no other residence, and lacks the resources or support networks to obtain other permanent housing</p>
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Additional Information about the HUD defined categories of homelessness can be found at <https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/four-categories/>

Category 1: Literal Homelessness

Must Meet One of the Three Categories

Has a primary nighttime residence that is a public or private place not meant for human habitation

Is living in a publicly or privately operated shelter designated to provide temporary living

Is exiting an institution where they have 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

[Additional information about Category 1 homelessness available on the HUD Exchange.](#)

Category 1: Literal Homelessness

What Does Literal Homelessness Look Like?

- Sleeping on the street, in a tent, in a park, or in a car
- Sleeping in an RV or in an abandoned building without utilities
- Sleeping in an emergency shelter
- Sleeping in jail or in the emergency room for a couple of nights and then going back to sleeping outside.

What Does Literal Homelessness NOT Look Like?

- Couch surfing
- Doubled up households
- Sober living homes
- Motels or Hotels Paid for by the Household

[Additional information about Category 1 homelessness available on the HUD Exchange.](#)

Documenting Category 1

Place not meant for human habitation

One of the following:

1. HMIS record of street outreach contacts (3rd party)
2. Written referral by street outreach, housing, or other similar service provider (3rd party)
3. Written observations of an outreach worker or other frontline staff of the living conditions (3rd party)
4. Written observations by a community member of the living conditions (3rd party)
5. Written observations by intake staff of the living conditions and explanation of attempts to secure 3rd party documentation (2nd party)
6. Certification by the individual of head of household seeking assistance and explanation of attempts to secure 3rd party documentation

Provider Certifications

“Other housing or service providers” include law enforcement, healthcare professionals, educators, or other providers who encountered the individual or head of household in an official capacity.”

If the other provider is unable to provide a written certification, the intake worker may document a conversation with that provider.

This is third-party documentation for the specific month(s) in which they encountered the individual or head of household.

Documentation Quiz

To document a client's length of time homeless, you obtained a written statement from your agency's outreach team. The statement says they spoke to the client on May 1 and observed the client's sleeping bag and personal items off a path near the creek.

1. How can you confirm this client's eligibility?
2. What type of documentation is this?



Documentation and Timing

- 3rd party evidence for category 1 can be up to 7 days old counting back from intake
- This is because anything past 7 days could potentially be considered a break in homelessness
- The homeless certification must be dated within 14 days prior to program enrollment
- A referral from a shelter June 7th would be an acceptable form of 3rd party documentation to verify homeless status though a program enrollment date of June 14th
- A referral from a street outreach team or clinician dated in early May would not be acceptable for 3rd party documentation of homeless status for a program enrollment of June 14th

Category 2: At Risk of Homelessness

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

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; *and*
- The individual or family lacks the resources or support networks needed to obtain other permanent housing.

Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

[Additional information about Category 2 homelessness available on the HUD Exchange.](#)

Documenting Category 2

Residence will be lost within 14 days

1. Court order or similar state action showing loss of residence within 14 days of application date
2. Evidence household will be unable to pay additional hotel/motel nights within 14 days of application date if staying at hotel/motel
3. Oral statement by household member that landlord will not let them stay, certified by accompanying statement by landlord, **OR** if unable to obtain landlord statement, documentation of due diligence trying to obtain statement from landlord **AND** written certification by household statement was true

No subsequent residence has been found

1. Certification by household no subsequent residence has been found

Household lacks resources or support networks to obtain permanent housing

1. Certification or other written documentation showing lack of resources/support networks

Category 4: Fleeing Domestic Violence

Any individual or family who:

Is fleeing, or is attempting to flee, domestic violence; **AND**

Has no other residence; **AND**

Lacks the resources and support networks (i.e., family, friends, faith-based or other social networks) to obtain other permanent housing.

Domestic violence includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual/family member that make them afraid to return to their primary nighttime residence.

[Additional information about Category 4 homelessness available on the HUD Exchange.](#)

Documenting Category 4

Self-certification that:

- Household is fleeing DV,
- No subsequent residence has been identified, and
- They lack resources/support network needed to obtain housing

The oral statement must be documented by:*

- Written observation by intake worker verifying the condition client is fleeing OR
- Written referral from an organization from whom the individual or head of household has sought assistance.

***If not a victim service provider and safety would not be jeopardized**





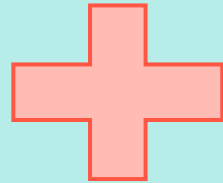
Defining and Documenting Chronic Homelessness

Defining Chronic Homelessness

Chronic Homelessness is the Primary Eligibility Requirement for Permanent Supportive Housing (PSH) Programs



DISABLING CONDITION



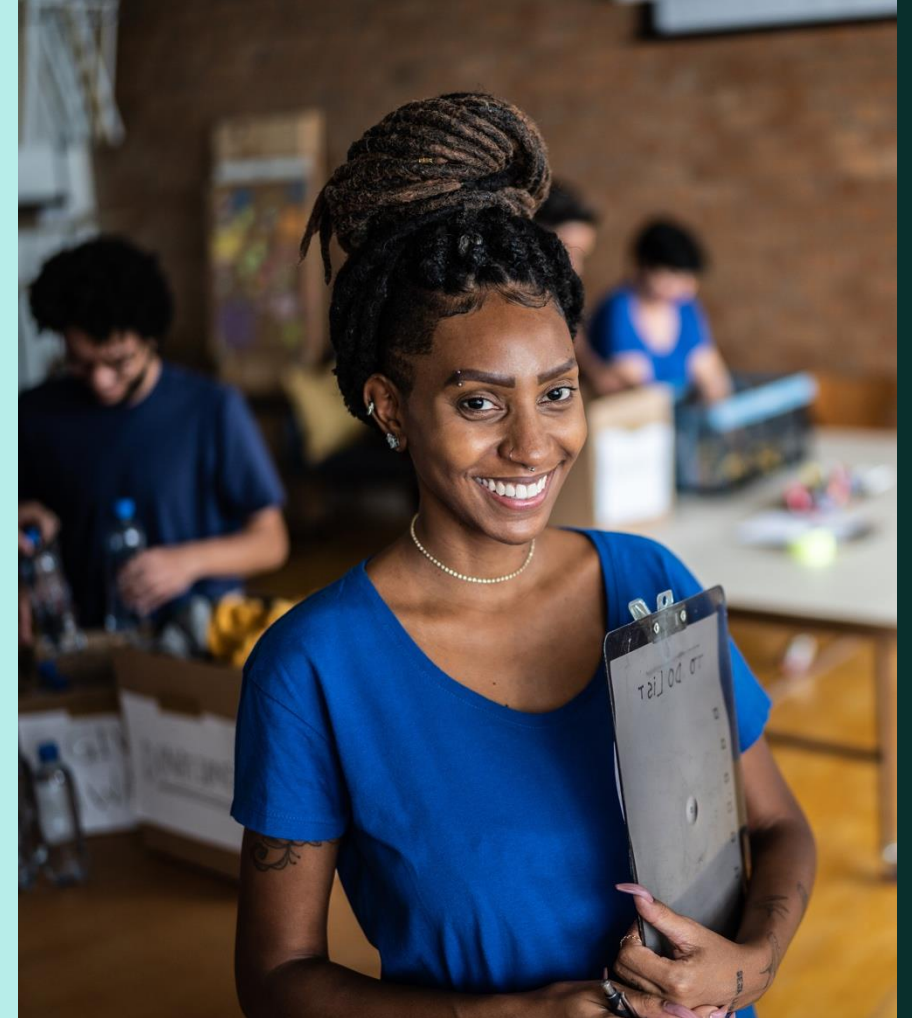
LONG OR MULTIPLE
HOMELESSNESS EPISODES

Documentation Requirements

Evidence that the head of household has a qualifying disability

Evidence that the program participant is **currently** residing in a location that makes them eligible

History of homelessness that demonstrates that the household meets the timing eligibility



Defining Chronic Homelessness: Time Homeless

- Time homeless must have been spent in:
 - A place not meant for human habitation (unsheltered),
 - An emergency shelter/safe haven.
- Time spent in transitional Housing **does not count** toward determining Chronic Homeless status.

Option 1:

- Has been homeless for at least 12 months

Option 2:

- On at least 4 separate episodes in the last 3 years, and
- The combined time for all occasions equaling at least 12 months.

Break in Homelessness:

- A break in homelessness mean the household was not living in one of homeless situations described for **7 or more consecutive nights**.

Experiencing Chronic Homelessness

Acceptable Forms of Documentation

Current Living Situation and Prior History:

- HMIS record of stays in an emergency shelter or outreach contacts; **or**
- Written verification from third-party source: service provider, healthcare professional, law enforcement officer of one or more encounter; or an outreach worker or intake worker observation; **or**
- Written verification completed by person seeking assistance

Forms to Document Chronic Homelessness

- Certification of Chronic Homelessness Form

Documenting History of Homelessness

- If you have **third-party documentation** of homelessness on one day, you can consider the individual homeless for the **entire calendar month**.
- **Unless** there is evidence that the individual spent at least 7 consecutive nights in a setting other than a place not meant for habitation, etc.
 - e.g., HMIS record that the individual was in transitional housing for 7 nights during that month

Example 1: 3rd party documentation for May 5th counts for may 1 through may 31

Example 2: 3rd party documentation for May 5, with an 8 day stay in hotel paid for by client May 11-18th does not count for May 1 through May 31. Additional documentation needed for May 18 and beyond

Limits on second- and Self-Certification

For most chronically homeless clients, no more than 3 months of homelessness may be documented using second-party or self-certification.

Exception: up to 25% of chronically homeless households in a project during an operating year may be documented second-party or self-certification for up to the full 12 months.

- This limitation does not apply to documentation of breaks in homelessness, which can be documented based on self-certification.

180 Day CH Documentation Rule

Recipients have 180 days from the time the participant is enrolled to obtain third party documentation before the participant is included in the 25%.

While documentation of eligibility is required at intake, written self-certification is acceptable until third party documentation can be obtained.

- Recipients that have reached the 25% allowance should use this additional time only for participants they are confident third-party documentation can be obtained for.

Recipients must still obtain third party documentation of disability within **45 days**.

Documentation Discussion

Who are some useful sources who can provide 3rd party documentation?



Documentation Forms

- The certification of chronic homelessness form walks you through all aspects you would need to show eligibility
- The verification of disability form can be used as a template to collect eligibility from a specialist certified to treat that disability

CERTIFICATION OF CHRONIC HOMELESSNESS

Appointment Date: ___/___/_____

Applicant Head of Household Name: _____

Referred By: _____

Interviewing Staff Name: _____



To confirm program eligibility, please complete this form in its entirety. In order to receive assistance from the _____ Program, an applicant must be chronically homeless according to the definition used by the U.S. Department of Housing and Urban Development (HUD). To be considered chronically homeless, a household must meet **at least one** of the specific elements of **each** of the following criteria:

1. **Housing Status**
 - a. **Have been continuously homeless for one year or longer, OR**
 - b. **Have experienced four or more episodes of homelessness in the past three years that amount to at least 12 months of homelessness in total.**
2. **Have an adult head of household (or minor head of household if no adult is present) who is living with a disability¹.**

[INSERT AGENCY NAME]
VERIFICATION OF DISABILITY



Date: [Click here to enter a date.](#)

To: [Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

From: [Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

[Click here to enter text.](#)

RETURN THIS VERIFICATION TO THE PERSON LISTED ABOVE.

APPLICANT INFORMATION

Name: [Click here to enter text.](#)

Date of Birth: [Click here to enter text.](#)

SSN: [Click here to enter text.](#)

Contact phone or email: [Click here to enter text.](#)

RELEASE: I hereby authorize the release of the requested information. Information obtained under this consent is limited to information that is no older than 12 months, unless authorized by me on a separate consent attached to a copy of this consent.



Documenting Disability

Disability Requirement

For a person to be considered chronically homeless, they must have a disabling condition.

When this is the case, recipients and subrecipients must document the disability status of all program participants at intake.



Disability Requirement

Physical, mental or emotional impairment

An impairment caused by alcohol or drug abuse, post-traumatic stress disorder, brain injury or a chronic physical illness

A severe, chronic disability that is attributable to a mental or physical impairment or combination

The condition is:

- Expected to be long-continuing or of indefinite duration; and
- Substantially impedes the person's ability to live independently.

Disability Requirement

Verification of Disability template can be used

The qualifying household member must be an adult head of household or minor head of household **when no adults are present.**

When there are multiple adults in the household (or multiple minors in a family with no adult) HUD does not specify which adult or minor must be identified as head of household for determining eligibility purposes.

Documenting a Disability

Written verification from a professional licensed by the state to diagnose/treat the disability

Written verification from the Social Security Administration

Receipt of a federal disability check (e.g., Social Security Disability Insurance, Veteran Disability Compensation)

Intake staff-recorded observation of disability that is confirmed within 45 days of the application for assistance and accompanied by at least one other acceptable piece of evidence

Other documentation approved by HUD

Documentation Quiz

Jordan says he has issues with substances. Can a college guidance counselor certify for substance use disorder?



Verification of Disability Form

1.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Does the Applicant have a physical, mental, or emotional impairment (including an impairment caused by alcohol or drug abuse, posttraumatic stress disorder, or brain injury) that:</p> <ul style="list-style-type: none">• is expected to be of long-continued or indefinite duration, and• substantially impedes his or her ability to live independently, and• is of a nature that such ability could be improved by more suitable housing conditions?
2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Does the Applicant have a developmental disability? Developmental disability is defined as:</p> <ul style="list-style-type: none">• A severe, chronic disability of an individual that is:<ul style="list-style-type: none">○ Attributable to a mental or physical impairment or combination of mental and physical impairments;○ Is manifested before the individual attains age 22;○ Is likely to continue indefinitely;○ Results in substantial functional limitations in three or more of the following areas of major life activity: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency; and,○ Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated. <p><i>Note: An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition may be considered to have a developmental disability without meeting three or more of the criteria above if the individual, without services and supports, has a high probability of meeting those criteria later in life.</i></p>
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Does the Applicant have Acquired Immunodeficiency Syndrome (AIDS) or Human Immunodeficiency Virus (HIV)</p>



Reporting and Ongoing and Annual Documentation

Annual Performance Report (APR)



The APR is an annual submission of aggregate provider-level data for all recipients of HUD-funded CoC homeless assistance grants



The purpose of the APR is to track provider-level activity over the years and monitor the outputs and activities for funds allocated



Information evaluated includes:

Location and type of services

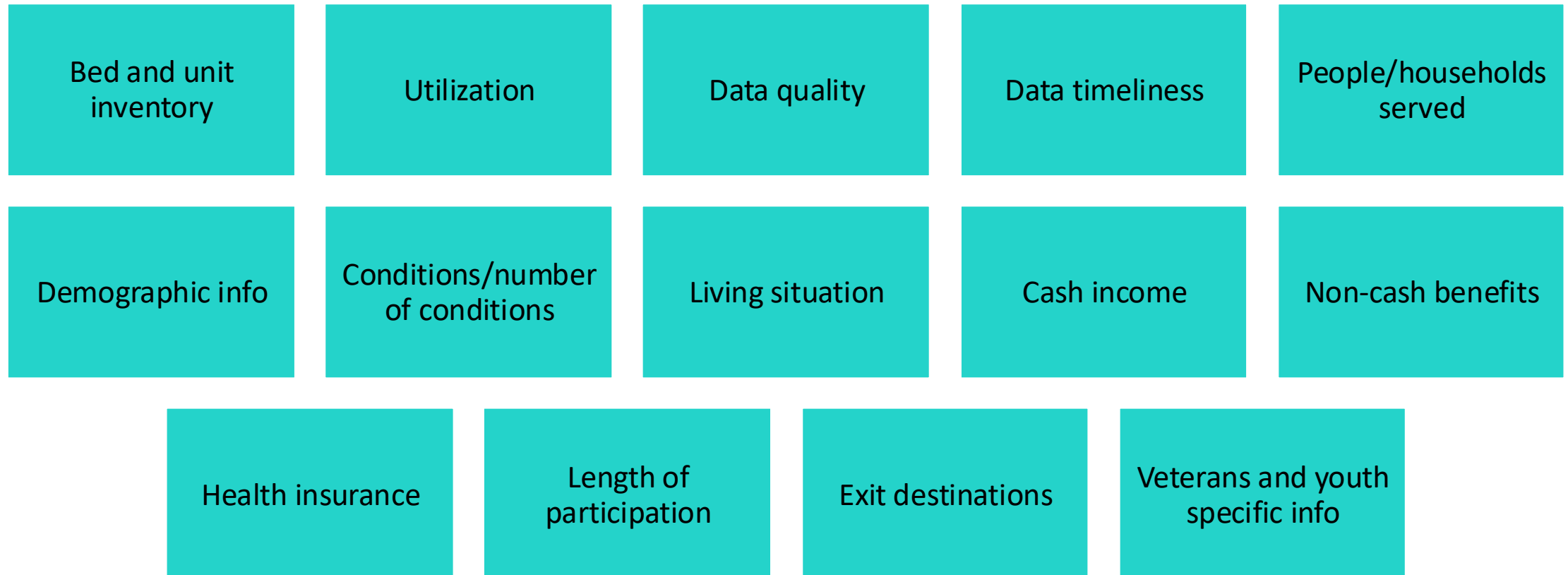
Data timeliness and completeness

Increased access to income and non-cash benefits throughout program stays

Consistent maintenance or exits to permanent housing destinations

What's on the APR?

Data collection for the APR is based on the most recent version of HUD's HMIS Data Standards. This currently includes:



HMIS Data Standards

Brief definitions of important data points

Destination

Where a household goes after program exit. Destinations are categorized into permanent, temporary, institutional, or other.

Health Insurance

Actual and regularly occurring health insurance. Indigent care, charity care, or a singular instance of coverage is not health insurance.

Cash Income Source

Regular, recurrent earned income and cash benefits. Separate from assets and lump sum amounts received such as settlements.

Non-Cash Benefit

Intended to identify regular, recurrent benefits. Services and/or gifts provided to clients during enrollment are not considered benefits.



A System Level View

Your Data has System Level and Funding Implications:

- Data from the ONE System and in the APR are sent to HUD through system level reports like the System Performance Measures (SPMs) and the Longitudinal Systems Analysis (LSA)
- Based on how communities do on these performance measures, they are more or less likely to get new projects funded
- Entering required information in the ONE System and data quality are both important for the project AND community

Ongoing and Annual Documentation



Ongoing and Annual Documentation:

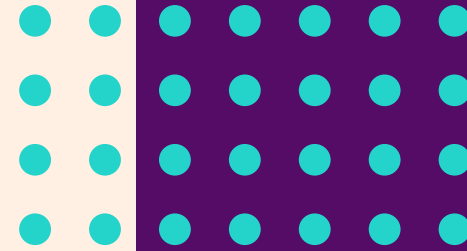
- Client Income
- Services Provided
- Program Participant Records
- Annual HQS Inspection

Applicable Documentation Template(s):

- Budget Form
- Client Rent Calculation Form
- HQS Inspection List



Additional Client Income Documentation Required



Under **24 CFR 578.103(a)(6)**, client file should include:

- Source documents, or
- A written statement by the relevant third party, or
- A written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation

Program Documents

Program documents can be found on the Napa CoC website

The screenshot displays the Napa County website interface. At the top, there is a dark navigation bar with the Napa County logo and the text "NAPA COUNTY CALIFORNIA". To the right of the logo is a search bar labeled "Search Napa County...". Below the navigation bar, there are several menu items: "How Do I?", "Government", "Departments", "Services", and "Emergency". The main content area features a left sidebar with a list of categories: "Applications", "Funding Notices", "Homeless Services", and "Program Documents". The "Program Documents" category is selected, and the main content area displays a list of documents under the heading "Program Documents". The breadcrumb trail at the top of the content area reads: "Home > Government > Boards & Commissions H - N > Napa City and County Continuum of Care > Program Documents".

Create a Website Account - Manage notification subscriptions, save form progress and more.

NAPA COUNTY
CALIFORNIA

Search Napa County...

How Do I? Government Departments Services Emergency

Applications
Funding Notices
Homeless Services
Program Documents

Home > Government > Boards & Commissions H - N > Napa City and County Continuum of Care > Program Documents

Program Documents

- [2024 New and Renewal Scoring Tools and Process](#)
- [Budget Form - Napa CoC \(PDF\)](#)
- [Client Rent Calculation Form - Napa CoC \(PDF\)](#)
- [Disclosure of Information on Lead-Based Paint - HUD Form \(PDF\)](#)
- [Document Checklist - PSH - Napa CoC \(PDF\)](#)
- [Document Checklist - RRRH - Napa CoC \(PDF\)](#)
- [HQS Inspection Checklist - HUD Form \(PDF\)](#)
- [Initial Subsidy Request Form - Napa CoC \(PDF\)](#)
- [Lead-Based Paint Brochure - HUD Form \(PDF\)](#)

Peer Learning



What is the hardest thing about documentation?

What strategies do you use to overcome those challenges?



Questions?

napa@homebaseccc.org

nick@homebaseccc.org

kris@homebaseccc.org

