

Who Can Certify a Client's Disability?

Background

To certify Chronic Homelessness, agencies must be able to prove to the Department of Housing and Urban Development (HUD) that the Head of Household has a disabling condition. A disabling condition is defined by HUD as a “diagnosable substance abuse disorder, serious mental illness or disability, including the co-occurrence of two or more of these conditions.” For many cases, evidence of the disabling condition must include third-party documentation of the disability, such as a signed declaration from a qualified healthcare professional. However, it is not always clear **who** counts as a suitable professional.

24 C.F.R. § 578.103(a)(4)(i)(B)(1) states that acceptable evidence includes “**written verification of the disability from a professional licensed by the state to diagnose and treat the disability.**” HUD later clarified this to state that professionals “must be licensed to treat whatever disability it is that they are confirming.”¹

To determine who in California is licensed to diagnose and treat disabilities, HomeBase reviewed state law and analyzed current CoC practices to reach a general consensus of what professions fall into this category. Based on this research, the professions addressed below are considered eligible to diagnose disabilities under the HUD definition.²

<i>Type of Professional</i>	Can They Sign Off on a Disability Verification Form?
<i>Alcohol and Drug Counselors</i>	Yes, if the counselor is accredited from one of the following organizations: <ol style="list-style-type: none"> 1. Addiction Counselor Certification Board of California, affiliated with the California Association for Alcohol/Drug Educators (CAADE) 2. California Association of DUI Treatment Programs (CADTP) 3. California Consortium of Addiction Programs and Professionals (CCAPP)
<i>Licensed Clinical Social Workers (LCSWs), Licensed Marriage and Family Therapists (LMFTs), Licensed Professional Clinical Counselors (LPCCs), and Licensed Educational Psychologists (LEPs)</i>	Yes, if the disability they are certifying is related to those conditions they are licensed to treat and diagnose.
<i>Medical Doctors</i>	Yes
<i>Nurse Practitioner</i>	Yes, but only with consultation by a physician/surgeon or pursuant to a delegation of authority by a physician or surgeon

¹ [Defining Chronically Homeless Final Rule](#), Combined Q&A Transcript. Regions 1 and 2. January 13, 2015. Webinar: Page 13.

² A cautionary note: Because this is an area of state law, rather than federal regulation, there are some discrepancies in how HUD staff members interpret the state’s licensing requirements. Areas in which HUD has raised questions are highlighted.

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<i>Osteopaths</i>	Yes
<i>Physician Assistant</i>	Yes, but only with consultation by a physician/surgeon or pursuant to a delegation of authority by a physician or surgeon
<i>Psychologists, Psychotherapists, and Psychiatrists</i>	Yes
<i>Registered Nurses</i>	No
<i>Social Workers Without a Clinical License, Case Managers, Residential Counselors</i>	No