



Chronic Homelessness Documentation Guide

Sonoma County Homeless Coalition

2025

Revised 2/14/2025

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Chronic Homeless Definition ([Final Rule](#))

An individual is defined by HUD as “**Chronically Homeless**” if they have a disability and have lived in a shelter, safe haven, or place not meant for human habitation for:

- 12 continuous months; or
- On at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months. Occasions must be separated by a break of at least 7 consecutive.

To be defined as chronically homeless, a person must be living on the street or in a homeless emergency shelter **at the time of eligibility determination**. The definition does not include those currently in transitional housing. Persons coming from transitional housing are not considered chronically homeless (the exception to this is explained later in the document labeled DedicatedPLUS).

Beginning **January 16, 2016**, CoC PSH projects are required to serve persons that are chronically homeless and may only accept new program participants that meet this definition (either 100% dedicated or DedicatedPLUS).

Homeless Documentation Order of Priority

1. Third-party documentation (including HMIS records);
2. Intake worker observations; or
3. Certification by the individual seeking assistance, which **must be accompanied by** the intake worker's documentation of the living situation of the individual or family seeking assistance and the steps taken to obtain evidence in paragraphs.

Self-Certification vs. Third Party Verification

1. 100% of households served can use self-certification for 3 of their 12 months;
2. 75% of households served need to use 3rd party for 9 months of their 12 months; and
3. 25% of households served can use self-certification as documentation for any and all months.

Third-Party Documentation

Acceptable forms of third-party Documentation

1. An individual record of a stay in an emergency shelter, a safe haven, or from a street outreach contact from an HMIS, or comparable database used by victim service or legal service providers; [FAQ 2757](#)
2. 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](#)
3. A written observation by a community member that has observed where the individual or head of household was living or is currently living; [FAQ 2759](#) and
4. A written referral by another housing or service provider (e.g., a member of law enforcement or a healthcare professional). [FAQ 2760](#)

Documentation needs to include

1. The role of the service provider;
2. Where the client was/is homeless with dated timeframe; and

3. Include workers name, title, agency, date and signature on a letterhead/work email.

If provider is unable to obtain 3rd party verification right away, the client needs to sign a self-certification form (during the intake) for the period of homelessness, and the worker must document due diligence of attempts to contact 3rd parties to verify (including attempts of 3rd party verification of all 12 months, even if 9 months of third party verification have been collected). This documentation needs to include a description of when and where the client was homeless. If the client cannot provide complete information about their specific whereabouts, such as an address or the name of a homeless shelter, during certain parts of their homeless history can explain the lack of information in a Self-Statement. The Statement should present the reason for the lack of information, such as an illness, that impedes a homeless person's ability to remember the missing information. This form needs to be signed and verified by the intake worker as a witness. This will be kept in the file as additional documents are obtained.

An intake worker may accept as third-party documentation, the oral or written observation of someone in the community, including but not limited to, a shopkeeper, a building owner, or a neighborhood resident (regardless of relationship with the household) that has **physically observed** where the individual or head of household is or has been residing. If the community member is unwilling to provide a written observation, the intake worker may document their conversation with the community member. The community member must indicate which **specific months they physically observed** the individual or head of household residing in a place not meant for human habitation. The intake worker must use their professional judgment to determine if the source is reliable.

Third party documentation (e.g., outreach staff) can be based off one single encounter if they see the person living in place not meant for human habitation. This can only be documented for the month they had the encounter. If records show otherwise, for example, you can see they were staying in transitional housing in HMIS during the same month, you cannot count this as an entire month of documentation.

Health care professionals can verify if their client is homeless without actually seeing them residing in a place not meant for habitation. The healthcare professional can provide a written or oral statement detailing that to the best of their knowledge and based on their professional judgment, the individual or head of household had been residing in a place not meant for human habitation at the time of the office visit. If the client is seen once a month for six months and reports being homeless during every appointment, the medical professional can verify their homeless status for the entire six months. The written or oral statement must include the dates in which the healthcare professional met with the individual or head of household and why they believe the person was residing in a place not meant for human habitation.

Where an intake worker's only encounter with the individual or head of household is at the current point in which they are seeking assistance, the intake worker's observation will not qualify as third-party documentation. Instead this would qualify as the second order or priority for written intake procedures and would not count towards the requirement that at least 9 months of the individual or head of household's period of homelessness be documented based on third-party documentation.

[Timeframe for 3rd Party Verification](#)

Additional time is often needed to obtain the appropriate documentation of an individual or head of household's chronic homeless status. Therefore, although the final rule requires documentation of

eligibility at intake to the project, it **does not require that all third-party documentation be acquired at the point of intake**. Please see HUD FAQ [2872](#).

HUD has determined that although the recipient must follow the order of priority for obtaining evidence as required in the final rule, **written self-certification at the point of intake for up to the full period of time homeless required by the definition of chronically homeless is sufficient** (if no other documentation can be obtained at that point in time) for the recipient to enroll the household into the project. The recipient then **must** work to obtain the required third-party documentation within 180 days from the point in which the project participant is enrolled in the project. Records of the attempts to collect third-party verification during the 180-day window must be stored in the clients file. These records can be in the form of written notes by the provider of phone calls made with dates and description, printed email requests, letters, etc.

Project participants that have been enrolled in the project for less than 180 days may be excluded from the calculation for determining whether or not at least 75% of program participants have at least 9 months of third-party documentation.

The 25% self-certification calculation includes all participants served during the current contract term, enrolled after January 15, 2016, and have been enrolled in the program for 180 days or more. If providers use the 25% self-certification allowance for participants, they must keep clear records showing this calculation for each grant term. These records must be available in case of an audit.

Following the first 180 days from the point of a program participant's enrollment, if the recipient or subrecipient has not been able to obtain third-party documentation for at least 9 months of the individual or head of household's residence in a place not meant for human habitation, a safe haven, or an emergency shelter, then one of the following applies:

1. If the recipient or subrecipient has not already reached their 25 percent cap, the program participant can continue to be assisted in the project and the recipient or subrecipient must consider this program participant as counting towards their 25 percent allowance; or
2. If the recipient or subrecipient has already reached their 25 percent allowance, **no additional CoC Program funds can be used** to continue serving this household in that project. For this reason, HUD encourages recipients that are currently at their 25 percent allowance to use this additional time carefully and only for program participants where they are fairly certain that the required third-party documentation can be obtained. It is also for this reason that HUD encourages recipients and subrecipients to continue to obtain at least 9 months of third-party documentation for program participants, even after a program participant has been enrolled in the program for some time, because if a recipient is ultimately able to obtain 9 months of third-party documentation of a head of household's homeless status, then that household can be removed from the 25 percent calculation.

Example: Henry is a program participant that entered a project on June 1st. He reports that he has been living in a place not meant for human habitation, a safe haven, or an emergency shelter for the last 12 months. At the point of intake, there was only 2 months of third-party documentation of Henry residing in one of these locations. The recipient of PSH may obtain a self-certification from Henry for the remaining 10 months in order to enroll Henry in the program and get him into housing. The recipient then has up to 180

days from the point of his enrollment to obtain at least 7 additional months of third-party documentation (to add to the 2 months that had been obtained at the point of intake) to get to the 9 months of required third-party documentation. At any point in time, the program will calculate whether or not they are meeting the requirement that at least 75 percent of program participants have third-party documentation for at least 9 months of their homelessness history based on program participants that enrolled after January 15, 2016 and had been enrolled in the program for 180 days or more. If the recipient is not able to do so, and is not at their 25 percent allowance, then they could continue to serve Henry, but must count him towards their 25 percent allowance. But, if the recipient was already at their 25 percent allowance, the recipient could no longer serve Henry in that project.

Please note, recipients must continue to obtain third-party documentation of the head-of-household's disability within 45 days, as required by the final rule.

Breaks in Homelessness

A break in homelessness is considered to be any period of 7 or more consecutive nights where an individual or family is not living in a place not meant for human habitation or emergency shelter.

Documentation of Breaks

The documentation standards for priority are the same as listed above, Homeless Documentation Order of Priority (1-3), and are **required to be included** within the file documentation if the client has had 4 separate occasions of homelessness in the last three years (must total 12 months) . **100% of breaks can be self-certified.**

Stays in institutional care facilities for **fewer than 90 days will not constitute as a break in homelessness**, as long as the participant was literally homeless the night prior to entry of the institution. The night homeless before entry needs to be documented in the order of the Homeless Documentation Order of Priority (1-3).

An individual qualifying under the second criteria of the definition need not have moved between conventional housing and homelessness. Participants may have spent time anywhere in between episodes of homelessness that could include medical settings, residential treatment programs, other kinds of institutions, transitional housing, supportive housing, motel paid for by the client (not an agency or charity), and/or correctional institutions.

Homeless Individual with a Disability

An adult head of household (or a minor head of household if no adult is present in the household) with a diagnosable substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability, including the co-occurrence of 2 or more of those conditions.

Disability Verification

1. Written verification of the disability from a professional licensed by the state to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently;
2. Written verification from the Social Security Administration;

3. The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation); or
4. Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence listed above.

DedicatedPLUS Units (CoC Program Funded PSH Only)

Recipients who receive funding as a DedicatedPLUS project **required to fill any new vacancies with another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area** ([HUD FAQ 3247](#)). This option allows for more flexibility when filling vacancies in Permanent Supportive Housing projects. Agencies should check their CoC project application to determine how many beds are dedicated to Chronically Homeless and how many are considered DedicatedPLUS. This concept only applies to permanent supportive housing (PSH) projects funded through the CoC Program.

As with dedicated chronic homeless beds, recipients must document the eligibility of all DedicatedPLUS participants served. As a reminder, DedicatedPLUS projects must serve individuals and families with one or more disability and who meet one or more of the following criteria at project entry:

1. Experiencing chronic homelessness;
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. Residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness prior to entering the project;
5. Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

DedicatedPLUS Documentation

For all program participants, recipients must obtain the following documentation:

1. Evidence that the individual or family member has a qualifying disability;
2. Evidence that the program participant is currently residing in a location that makes them eligible;
3. Where the program participant does not presently meet the definition of chronically homeless, evidence of the length of time they resided in an emergency shelter, safe haven, or place not meant for human habitation prior to residing in the location that made them lose their chronically homeless status to determine whether they previously met the criteria for chronic homelessness.

In obtaining the documentation above, recipients must follow HUD's documentation requirements. This means to document disability status of the head of household, recipients must obtain third-party documentation that meets the standards.