



Sonoma County Community Development Commission

Order for Obtaining Verification of Eligibility

Purpose

Homeless service projects each have specific eligibility criteria that participants must meet in order to obtain or continue to receive services through that project. HUD provides the preferred order for documentation of eligibility, as well as standards for ensuring that records maintained by program staff sufficiently demonstrate compliance with the recordkeeping requirements.

Policy

Homeless services projects funded by the SCCDC through HOME Sonoma will obtain verification of eligibility, during the initial intake evaluation and any required re-evaluations. The verification of eligibility must follow HUD's preferred order of documentation of Third Party verification first, Intake Worker observation second and self-certification by the program participant third. All documentation of eligibility for initial evaluations and re-evaluations must be kept in the participant file.

Procedure

Intake Worker should make every effort to obtain verification of eligibility in the following order:

1. Third Party Verification
 - a. Third Party written verification, including already available documents
 - b. Third Party oral statement
2. Intake Worker Observation
3. Self-Certification by applicant/participant

Third-Party Documentation

All Third-Party documentation should be signed and dated by the third party (as appropriate).

Priority for of Third Party documentation

1. **Third-Party Written Verification** document standards:
 - a. Conform to general documentation standards
 - b. Demonstrate that it came from an appropriate party, for example:
 - i. Official communication or referrals on agency letterhead or program form;
 - ii. Email from provider/third party from an agency email address;



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- iii. Standardized Certification form;
 - iv. Discharge paperwork from an institution or
 - v. HMIS record—both must contain information about the dates the potential program participant resided there.
- c. Recommend using a standardized form for the program

2. Third-Party Oral Statement document standards:

- a. Conform to general documentation standards
- b. Identify the third-party providing the oral verification and date oral verification was received
- c. Identify the intake worker recording the oral statement
- d. Include signed and dated certification by the intake worker as true and complete
- e. Recommend using a standardized form for the program

Intake Worker Observation documentation standards:

1. Conform to general documentation standards
2. Identify the intake worker making the observations
3. Include signed and dated certification by the intake worker as true and complete
4. Recommend using a standardized form for the program

Self-Certification documentation standards:

1. Conform to general documentation standards
2. Identify the individual or head of household providing the self-certification
3. Include signed and dated certification by the individual or head of household as true and complete*
4. Recommend using a standardized form for the program

*Note: Victim service providers do not need to have signed and dated certification from the individual or head of household.

Additional guidance for documenting homeless status for HUD:

1. Intake workers are responsible for obtaining the evidence of homeless status, not applicant/participant.
2. An intake worker should NOT contact anyone for documentation that the person feels would jeopardize his or her safety.
3. If a Self-Certification is provided for verification of eligibility, Intake Workers must document their due diligence in trying to obtain Third Party Verification.
 - a. **Due diligence documentation** should include the following:



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- i. Description of efforts to contact and obtain third-party documentation, including dates, times, and supporting documentation
- ii. Description of outcome, including obstacles encountered
- iii. Signed and dated certification by intake workers that all documents are true and complete
- iv. Recommend using a standardized form for the program

Exceptions

Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Verification of eligibility can be documented through Intake Worker Verification or Self-Certification by the individual or family.

Individuals and Families Fleeing Domestic Violence

Non-Victim Service Providers

If the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement and completion of the Self-Certification by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing.

Where the health and safety of the individual or family is not jeopardized the oral statement must be verified through third party verification. If the health and safety of the individual or family would be jeopardized, intake worker must document reason for this. Intake worker should only document the minimum information needed to show proof of eligibility.

Victim Service Providers

If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a Self-Certification by the individual or head of household; or a certification by the intake worker. The certification must include that the individual or head of household seeking assistance are fleeing that situation, and that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing.

Third Party certification can be issued by an organization from whom the individual or Head of Household has sought assistance related to domestic violence, dating violence, sexual assault or



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stalking. This may include housing service providers, social workers, law enforcement, legal assistance, health care provider or pastoral counselor. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

Forms:

Third Party Verification

Intake Worker Observation

Self-Certification

Additional Resources:

<https://www.hudexchange.info/trainings/courses/homeless-status-recordkeeping-requirements-webinar-for-esg-grantees1/>

[Determining Homeless and At-Risk Status, Income and Disability Webinar](#)

Policy for Documenting Homeless Status

Policy for Documenting At-Risk of Homelessness Status

Policy for Documenting Income