



## Recordkeeping and Reporting Requirements

### Order Of Priority for Obtaining Evidence of Homelessness and/or At-Risk of Homelessness

HUD Continuum of Care (CoC) Program-funded grant recipients and subrecipients must maintain complete, up-to-date written records and procedures for each CoC Program-funded project.

Recipients must maintain and follow written intake procedures to comply with the homeless definition in [24 CFR 578.3](#). CoC Program-funded PSH programs are also required to document a program participant's status as chronically homeless as defined in [24 CFR 578.3](#) and in accordance with [24 CFR 578.103](#). The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.

The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, a lack of third-party documentation must not prevent an individual or family from being immediately admitted to an emergency shelter, receiving street outreach services, or being immediately admitted to a shelter or receiving services provided by a victim service provider on a temporary basis until third party documentation. Records contained in Chester County HMIS or an HMIS-comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation.



## Chester County Street Outreach Program Recordkeeping Policies and Procedures

The Chester County Homeless Street Outreach Program is responsible for obtaining and documenting evidence of homelessness as per the PA-505 CoC Order of Priority recordkeeping and reporting requirements above. Street outreach staff must comply with all the following policies and procedures.

- Street Outreach staff must enter and maintain accurate evidence of homelessness in client records in Chester County HMIS. These records must be maintained in Chester County HMIS or an HMIS-compatible database for at least five years.
- Unsheltered persons receiving street outreach may request information regarding how to access information stored and used regarding outreach services. If the request is made, street outreach staff shall inform the unsheltered person which information is part of an engagement and service record, how that information is stored and protected, and how to access or amend that information in the future if they so desire. The address or location of any family violence project assisted with CoC funds will not be made public, except with written authorization of the person responsible for the operation of the project, and the address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with State and local laws regarding privacy and obligations of confidentiality [§ 578.23\(c\)\(4\)\(ii\)](#).
- The order of priority for obtaining evidence of homelessness varies based on the HUD definitions of homelessness as follows.

### Category 1: Literally Homeless

<b>Definition</b>	Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has 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.
<b>Order of Priority for Obtaining Evidence</b>	<ol style="list-style-type: none"> <li>1. Written observation by the outreach worker; or</li> <li>2. Written referral by another housing or service provider; or</li> <li>3. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter.</li> </ol>

	<p>4. For individuals exiting an institution- one of the forms of evidence above <u>and</u>:</p> <ol style="list-style-type: none"> <li>a. Discharge paperwork or written/oral referral or</li> <li>b. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution.</li> </ol>
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**Category 2: Imminent Risk of Homelessness**

<p><b>Definition</b></p>	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ol style="list-style-type: none"> <li>(i) Residence will be lost within 14 days of the date of application for homeless assistance;</li> <li>(ii) No subsequent residence has been identified; <u>and</u></li> <li>(iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing.</li> </ol>
<p><b>Order of Priority for Obtaining Evidence</b></p>	<ol style="list-style-type: none"> <li>1. A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u></li> <li>2. For individual and families leaving a hotel or motel- evidence that they lack the financial resources to stay; <u>or</u></li> <li>3. A documented and verified oral statement <u>and</u></li> <li>4. Certification that no subsequent residence has been identified <u>and</u></li> <li>5. Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing.</li> </ol>

**Category 4: Fleeing/Attempting to Flee Domestic Violence**

<p><b>Definition</b></p>	<p>Any individual or family who:</p> <ol style="list-style-type: none"> <li>(i) Is fleeing, or is attempting to flee, Domestic Violence;</li> <li>(ii) Has no other residence; <u>and</u></li> <li>(iii) Lacks the resources or support networks to obtain other permanent housing.</li> </ol>
<p><b>Order of Priority for Obtaining Evidence</b></p>	<p>For victim service providers:</p> <ol style="list-style-type: none"> <li>1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.</li> </ol> <p>For non-victim service providers:</p> <ol style="list-style-type: none"> <li>1. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the</li> </ol>

	<p>individual or family is not jeopardized, the oral statement must be verified; <u>and</u></p> <ol style="list-style-type: none"> <li>2. Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u></li> <li>3. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain permanent housing.</li> </ol>
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**At Risk of Homelessness**

<p><b>Definition</b></p>	<p>An individual or family who:</p> <ol style="list-style-type: none"> <li>(i) Has an annual income below 30% of median family income for the area; <u>AND</u></li> <li>(ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u></li> <li>(iii) Meets one of the following conditions:             <ol style="list-style-type: none"> <li>(A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u></li> <li>(B) Is living in the home of another because of economic hardship; <u>OR</u></li> <li>(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u></li> <li>(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u></li> <li>(E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u></li> <li>(F) Is exiting a publicly funded institution or system of care; <u>OR</u></li> <li>(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan.</li> </ol> </li> </ol> <p><u>OR</u></p> <p>A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.</p> <p><u>OR</u></p> <p>An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.</p>
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<p><b>Order of Priority for Obtaining Evidence</b></p>	<p>Projects are required to follow the documentation standards in <a href="#">24 CFR 576.500</a>, including, but not limited to:</p> <ul style="list-style-type: none"><li>• Documentation specified under this section for determining annual income.</li><li>• The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks.</li><li>• The most reliable evidence available to show that the program participant does not have sufficient resources or support networks.</li><li>• The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness” in <a href="#">§ 576.2</a>.</li></ul>
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