

## ***Establishing Local Documentation Standards for DedicatedPLUS***

HUD requires that recipients and subrecipients maintain and follow locally established written procedures to confirm a household's homeless status and eligibility. For an overview of eligibility and minimum documentation standards required by HUD, see [\*Overview of DedicatedPLUS Recordkeeping Requirements\*](#).

These procedures must require documentation, at the point of intake and enrollment, of the evidence used to verify current homeless status and additional eligibility requirements for DedicatedPLUS projects. Additionally, the recipient's written intake procedures must establish an order of priority for obtaining evidence as follows: third-party documentation first (preferred), intake worker observation second, and certification from the person seeking assistance third. Unlike the recordkeeping requirements included in the Final Rule on Defining "Chronic Homelessness," HUD does not establish a minimum number of months of homelessness that must be documented via third-party source.

While there are no requirements on the number of months of an individual's homeless status that must be documented, recipients must ensure they meet the requirements of the CoC Program; therefore, HUD recommends CoCs adopt specific standards for *DedicatedPLUS* for each of the following:

- Point of enrollment: When eligibility is verified and the household is accepted and enrolled into the project.
- Documentation Expectations:
  - Minimum number of months of a head of household's homeless history expected to be documented with third-party sources and exceptions, if desired.
  - The level of effort intake workers are expected to follow to obtain third-party documentation for homeless status and history and how that effort can be sufficiently documented (due diligence).

CoCs, as well as recipients and subrecipients, are discouraged from creating standards that are more stringent than necessary as this may create a barrier to accessing permanent housing for the most vulnerable households and unnecessarily delay the lease-up process.

### *Recommended Process for Documenting Housing and Homelessness History for DedicatedPLUS*

The following example is one that a CoC could adopt to streamline the documentation process and ensure consistency across CoC-funded *DedicatedPLUS* Permanent Supportive Housing (PSH). It includes placeholders where further decisions will need to be made by the CoC.

1. **Pre-Screen Referrals.** As part of the coordinated entry referral process, intake staff can run a report in HMIS that identifies all households in the Coordinated Entry System (CES) with a current HMIS record that indicates (1) Disability (HMIS Data Element 3.8)

and (2) history of homelessness for at least 12 months in the last 3 years (HMIS Data Element 3.917). CoCs can work with the HMIS Lead to build out a report that can be accessed by intake staff for this purpose. This could help expedite identifying those households in the community who are most likely to be eligible and reduce the occurrence of referrals of households who are not eligible for a *DedicatedPLUS* project resulting in longer vacancy times.

2. **Review HMIS Housing History Report.** Intake staff should always start by reviewing [HMIS housing history data](#)<sup>1</sup> of actual entry and exit dates in HMIS for a household. It is possible that most or all the household's history of residing in an eligible location may be captured here. It also will allow the intake staff to determine the extent to which additional history and documentation is needed.
3. **Review Self-Reported Homeless History.** Intake staff should review the household's self-reported housing and homelessness history in HMIS from most recent assessment information and discuss the household's history directly with the household to begin to identify dates in which the household reports having resided in an eligible location but which was not captured in HMIS. During this discussion, the intake worker should attempt to get as much information as possible about potential third-party documentation sources as well (e.g., the name of the emergency shelter where the head of household was residing).
4. **Verify Housing and Homelessness History.** Although there is not a minimum number of months for which third-party documentation is required, intake staff should seek to obtain third-party documentation for as much of the reported history that is not documented in HMIS as is possible. Intake staff will follow the due diligence expectations of the CoC or recipient when verifying current homelessness and homelessness history. This does not need to be an overly burdensome or time-consuming process. Instead, the CoC and recipients of PSH shall simply have a consistent process that is followed.

#### Establishing Due Diligence Requirements:

In general, when documenting eligibility for a project, CoCs or recipients should adopt standards for the level of effort intake workers are expected to follow to obtain third-party documentation for homeless status and history. This is also known as establishing due diligence standards. When deciding the appropriate due diligence standards for documented eligibility for *DedicatedPLUS* projects, CoCs should consider

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<sup>1</sup> This video from 2018 covers how to use HMIS to document a client's chronic homeless status for eligibility purposes by reviewing entry and exit dates in HMIS. Although specific to chronic homelessness at the time, the same type of report can be utilized to gather third-party documentation for *DedicatedPLUS* eligibility.

- Extent to which there is a *locally* established minimum number of months expected for third-party documentation. For example, a CoC could establish a local standard that requires that at least 4 months of the homelessness history be documented via third-party source. Where such a local standard is adopted, it is recommended that the CoC also establish a local policy that allows for extenuating circumstances.
- Extent to which attempts to find other third-party sources is necessary (due diligence) and how those attempts must be documented. The standards should consider:
  - How many attempts to contact a potential source are necessary? Example of an acceptable local policy: Intake worker is only required to make two attempts to contact a potential third-party source.
  - What length of time must a potential source be given to respond? Example of an acceptable local policy: After 48 hours with no response, intake worker will meet due diligence threshold and can accept self-certification for the defined months.
  - What is the standard for the intake worker to document attempts? Example of an acceptable local policy: Intake worker will maintain case notes that document efforts made to collect additional third-party information.

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