



# HOME-ARP Documenting Qualifying Populations

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# Agenda – Documenting Qualifying Populations

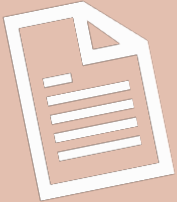
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- Overview
- General HOME-ARP Recordkeeping Requirements
- Documentation for each Qualifying Population
  - Definition
  - Key Components
  - Documentation
  - Case Scenarios
- Recordkeeping for Common Preferences and Methods of Prioritization
- Summary
- Questions

# HOME-ARP Overview

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Congress created four Qualifying Populations (QPs) and intended for all four QPs to be served under the HOME-American Rescue Plan (HOME-ARP) program.



To adhere to congressional intent, HUD created **Notice: CPD-21-10**, referred to as “the Notice”, which clearly defines each QP.



This webinar provides information on how to document QP criteria based on HUD recordkeeping requirements in the Notice Section VIII.F.

# Qualifying Populations (QPs)



- QP definitions are specific to HOME-ARP.
- QP definitions primarily focuses on living situations.
- Income limitations are not part of every QP definition.

# HOME-ARP Program Administration Overview

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Section VIII of HOME-ARP CPD-21-10 Notice Includes:

- A. PJ responsibilities
- B. Written agreement requirements by activity type
- C. Grants Management
- D. Uniform Administrative Requirements
- E. Financial Management
- F. Recordkeeping** (This clinic will focus on recordkeeping for QPs)
- G. Confidentiality Requirements
- H. Reporting Requirements



# HOME-ARP QP Documentation & Recordkeeping Requirements (Section VIII.F. of CPD-21-10)



# General QP Documentation & Recordkeeping: Contractors/Owners/Subrecipients

- Contractors/Owners/Subrecipient compliance considerations:
  - PJs are ultimately responsible to HUD;
  - PJ and subrecipient recordkeeping/confidentiality policies and procedures must be updated for HOME-ARP;
  - PJs and HUD will monitor subrecipient records to ensure that QP eligibility is sufficiently documented.
- Written Agreements between PJ and Contractors/Owners/Subrecipients must stipulate all recordkeeping requirements.



**Best Practice:** Clearly describe in detail the recordkeeping requirements for QP status in the written agreement.

# General Recordkeeping: Project-level Considerations

## Which QP preferences and limitations are outlined in the accepted Allocation Plan?

- QP preferences and limitations require the collection of additional documentation to support the preference/limitation
- For example: An activity with a QP1 preference for chronic homelessness requires documentation for QPs served meeting chronic homelessness preference requirement

## How will your PJ ensure QP confidentiality?

- Consider recordkeeping processes that ensure confidentiality for all QPs. There are special considerations for QP3.
- Only keep minimum required documentation in file.

## Who will be responsible for collecting QP documentation?

- Even if subrecipients carry out HOME-ARP activities, ultimately the PJ is responsible to HUD.
- The project level referral method identifies the entities responsible for collecting QP documentation.
- Make sure who is responsible for collecting QP documentation is clear in your written agreements and policies and procedures.



# General QP Recordkeeping: Preferred Order

This preferred order of documents **MUST** be followed for QP1 and QP2, and QP4.  
This preferred order of documents **DOES NOT** apply to QP3.

## First Tier: Third Party Verification

Including written and source documentation, and database records (like HMIS)



## Second Tier: Intake Worker Observation

Written, signed and dated observation of staff completing intake.



## Third Tier: Self-Certification

Written, signed and dated self-certification by the individual or head of household seeking assistance

# General Recordkeeping: Third Party Verification

## First Tier Documentation: Third Party Verification

### Source Documents

- Pre-existing records from a third party provided to intake staff such as receipts and printouts from relevant third-party information systems
- **Examples:** SSI award letter, Eviction Notice, Discharge paperwork

### Written Verification

- Letters, written referrals, or written observations by another person that are signed, dated, and on appropriate letterhead.
- **Examples:** Written observation of a shopkeeper, written referral from law enforcement, letter from property owner that person must leave

### Documented Oral Verification

- Verification provided by a third party given over the phone or in person directly to the intake staff. Intake staff records the statement in writing, certifies its true and completes, signs and dates.
- **Example:** Intake worker calls leaseholder who confirms that the family can no longer stay in her apartment after this week because of a pending lease violations.

# General Recordkeeping: Intake Worker Observation

## Second Tier Documentation: Intake Worker Observation



### Intake Worker observation must:

- Be issued on third party letterhead or from an agency email address
- Identify the intake worker that made the observation
- Certify that the statement is true and complete
- Be signed and dated by the intake worker
- **Example:** An intake worker physically observes a person residing in their car and writes, signs and dates the observation for the record.

# General Recordkeeping: Self Certification

## Third Tier Documentation: Self-Certification



### Self-Certification must:

- Identify the individual or head of household
- Provides detail of specific criteria being documented
- Certify that the statement is true and complete
- Be signed and dated by the individual or head of household



# Documentation: General Tips



## Use multiple methods or data sources

- Multiple pieces of documentation are often necessary to document QP eligibility



## Use a client-focused approach

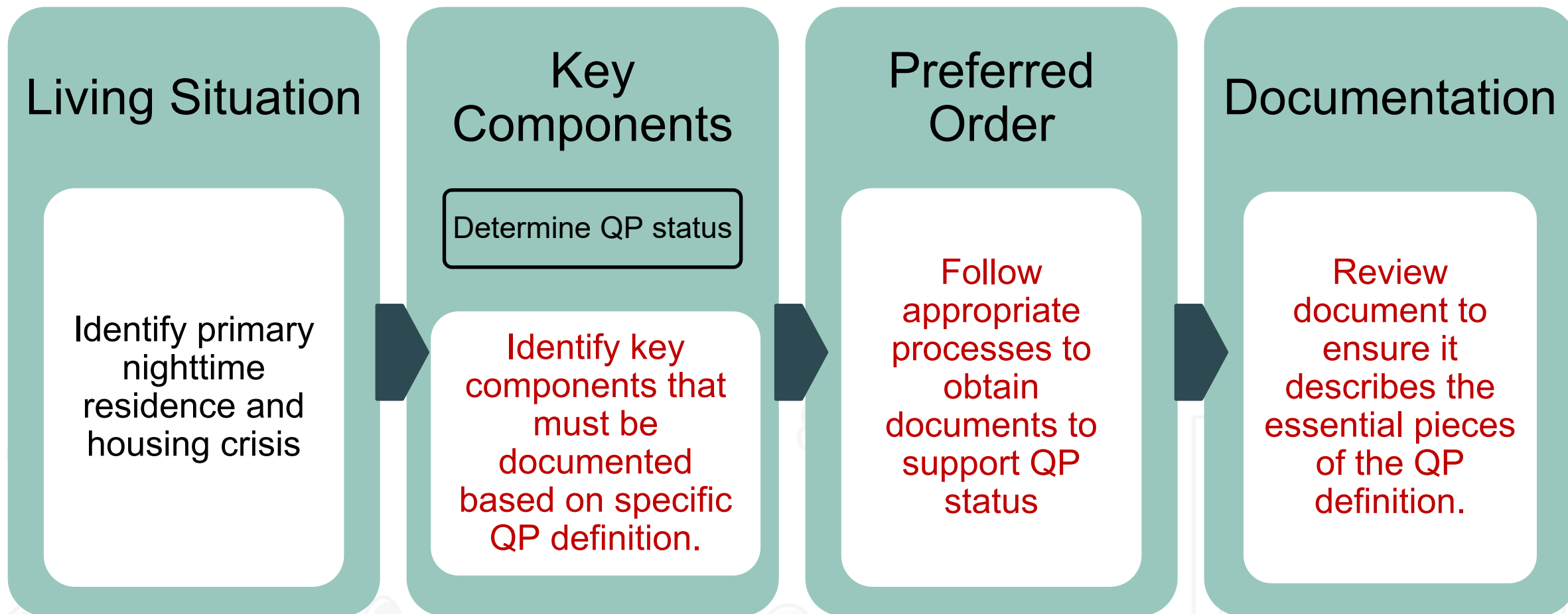
- “What can you provide to demonstrate your housing crisis?”
- Don’t require something that can’t be provided
- Documentation will be specific to each household's circumstances



## Self-certifications should be infrequent, but are permitted

- Consider what additional documentation is available to support the self-certification

# Documentation: Determining Documentation Needed



# Qualifying Population 1:

## Homeless



# Summary Definition: QP1

Defined in the Notice Section IV.A.1 which refers to 24 CFR 91.5  
“Homeless” paragraphs (1)-(3)

- Paragraph 1: Literally Homeless
- Paragraph 2: Imminent Risk of Homelessness
- Paragraph 3: Homeless Under Other Federal Statutes

**Please note: Paragraph 4, Category 4 of the Homeless Definition, individuals and households fleeing domestic violence is not included under the HOME-ARP Homeless definition.**



# Definition: QP1 Paragraph 1

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**HOME-ARP Notice:** Section IV.A.1


**Regulation:** 24 CFR 91.5 paragraph 1

**Referred to as:** Literally Homeless

An individual or family who lacks a fixed regular, and adequate nighttime residence meaning:

- Primary nighttime residence that is a public or private place not designed for regular sleeping accommodations for human beings.
- Living in a supervised publicly or privately operated shelter designed to provide temporary living arrangements.
- Exiting an institution where he or she resided for 90 days or less and who resided in emergency shelter or place not meant for human habitation immediately prior to entering that institution.

# Key Components: QP1 Paragraph 1

 **No Income Requirement**

## Literally Homeless

- **Living situation**
  - Place not meant for human habitation
  - Emergency Shelter
  - Hotel/Motel paid for by charitable or governmental organization
  - Institution for less than 90 days (homeless immediately prior)

# Definition: QP1 Paragraph 2

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**HOME-ARP Notice:** Section IV.A.1

**Regulation:** 24 CFR 91.5 paragraph 2

**Referred to as:** Imminent Risk of Homelessness


- An individual or family who will imminently lose their primary nighttime residence within 14 days of the date of application for assistance, **AND**
- No subsequent residence has been identified, **AND**
- Household lacks resources or support networks needed to obtain other permanent housing



# Key Components: QP1 Paragraph 2

## Imminent Risk of Homelessness

- **Timeline** (14 days from losing residence), and
- **Lack of resources and support to obtain other housing, and**
- **No other residence identified**

 **No Income Requirement**

# Definition: QP1 Paragraph 3

**HOME-ARP Notice:** Section IV.A.1

**Regulation:** 24 CFR 91.5 paragraph 3

**Referred to as:** Homeless Under Other Federal Statutes


Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under the QP1 definition but who are defined as homeless under one of the other listed federal statutes under Section IV.A.1,

## AND

- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any in the last 60 days, immediately prior to the date of application for assistance; AND
- Have experienced persistent instability as measured by two or more moves in the last 60 days; AND
- Can be expected to continue in such status for an extended period of time due to special needs or barriers (For example: chronic health or mental health conditions, substance addiction, history of DV or child abuse)

# Key Components: QP1 Paragraph 3

## Homeless Under Other Federal Statutes

 **No Income Requirement**

- **Meets definition of homeless in other federal statutes**
- **History of living situation:** No permanent housing in the last 60 days or moving two or more times, AND
- **Barriers:** Presence of special needs or 2 or more barriers.

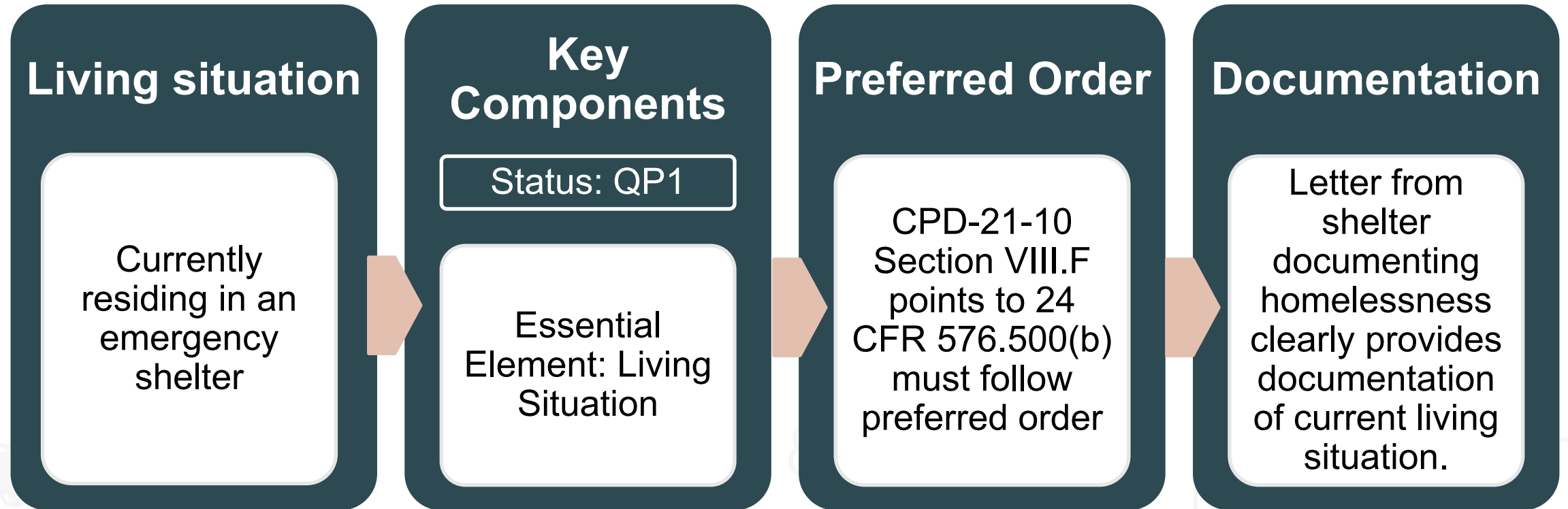
# Case Scenario

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A participant states that he is **homeless** because he is currently **residing in a tent in a local park**. You request documentation to verify the participant's current living situation from HMIS and the local shelters. The client has an HMIS entry indicating the client is staying in an emergency shelter program for the past week. The shelter provides a letter that indicates the client is residing at their shelter.



# Case Scenario





# Qualifying Population 2:

## At Risk of Homelessness



# Summary Definition: QP2

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Defined in the Notice Section IV.A.2 which refers to 24 CFR 91.5 “At Risk of Homelessness”

- Paragraph 1: Individuals and Families
- Paragraph 2: Unaccompanied Children and Youth
- Paragraph 3: Families with Children and Youth



# Definition: QP2 Paragraph 1

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**HOME-ARP Notice:** Section IV.A.2

**Regulation:** 24 CFR 91.5 paragraph 1

**Referred to as:** Individual and Families

An individual or family who:

- Has an annual income below 30% AMI, **AND**
- Does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place defined in “Literally homeless” definition, **AND**
- Meets one of seven ( 7) conditions



# Definition: Evidence of Housing Instability A-G

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room;
- (F) Is exiting a publicly funded institution, or system of care
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

# Key Components: QP2 Paragraph 1

## Paragraph 1

- **Income**
  - Less than 30% AMI
- **Lack of resources and support**
- **Evidence of housing instability (A-G)**



**Income  
Requirement**

# Definition: QP2 Paragraph 2 & 3

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**HOME-ARP Notice:** Section IV.A.2

**Regulation:** 24 CFR 91.5 paragraph 2 & 3

**Referred to as:** Unaccompanied Children & Youth, Families with Children & Youth

## Paragraph 2

- A child or youth who does not qualify as “homeless” under the homeless definition but qualifies as “homeless” under listed federal statutes.

## Paragraph 3

- A child or 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 (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

# Key Components: QP2 Paragraph 2 & 3

## Paragraphs 2 & 3

- **Meet definition of homeless under other federal statutes**
- **Includes parents or guardians living with a child or youth who qualify under paragraph 3**



**Income  
Requirement**

# Case Scenario

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A HOME-ARP applicant is **being evicted** from their apartment **in 18 days**. The applicant states they lost their job and are **receiving unemployment benefits**. The applicant states they have **no other immediately available resources**.





# Case Scenario

## Living Situation

Currently housed  
facing eviction  
within 18 days

## Key Components

**Status: QP2**

Income

Lack of resources  
and support.

Meets one of the  
conditions of A-G

## Preferred Order

CPD-21-10 Section  
VIII.F points to 24  
CFR 576.500(c)  
must follow  
preferred order

## Documentation

**Income:**  
Unemployment  
benefit letter

**Lack of  
resources:** Bank  
Statement

**Conditions A-G:**  
Eviction notice

# Qualifying Population 3:

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking



# Summary Definition: QP3

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Defined in the Notice Section IV.A.3


- Fleeing, or attempting to flee:
  - domestic violence
  - dating violence
  - sexual assault
  - stalking
  - human trafficking (labor or sex trafficking)

# Definition: QP3

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- **Domestic Violence:** defined by 24 CFR 5.2003
- **Dating violence:** defined by 24 CFR 5.2003
- **Sexual Assault:** defined by 24 CFR 5.2003
  - Any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent
- **Stalking:** defined by 24 CFR 5.2003
  - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or suffer substantial emotional distress
- **Human Trafficking:** defined by 22 U.S.C. 7102
  - Sex Trafficking
  - Labor Trafficking

# Key Components: QP3

 **No Income Requirement**

QP 3

- **Threat of harm based on current living situation.**
- **There are no income or homeless status requirements.**

# Case Scenario

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A HOME-ARP applicant states that he and his daughter are at **imminent risk of harm due to a domestic violence** situation at their apartment.



# Case Scenario

## Living Situation

Housed but threat of harm at current residence due to domestic violence



## Key Components

Status: QP3

Threat of harm



## Preferred Order

CPD-21-10 VIII.H.2, **does not follow preferred order**, collect only minimal information.



## Documentation

Intake worker writes oral statement by the head of household that that they are attempting to flee from domestic violence where there is an imminent risk of harm.

# Qualifying Population 4:

## Other Populations



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# Summary Definition: QP4

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Defined in the Notice Section IV.A.4

- **Paragraph 1:** Other Families Requiring Services or Housing Assistance to Prevent Homelessness
- **Paragraph 2:** At Greatest Risk of Housing Instability
  - i. Extremely Low Income & Severe Cost Burden
  - ii. Low Income & At Risk of Homelessness

# Definition: QP4 Paragraph 1


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- Providing supportive services or assistance to individual and households to prevent homelessness
  - This Includes:
    - Previously homeless; **AND**
    - Housed due to temporary or emergency assistance (such as time-limited rental assistance programs or emergency rental assistance programs that is ending); **AND**
    - Need for additional assistance to prevent return to homelessness.

# Key Components: QP4 Paragraph 1

## QP4 Paragraph 1:

- Previous **homeless history**
- Currently housed in **temporary or emergency assistance** program that is ending
- Additional **assistance needed to prevent** return to homelessness

 **No Income Requirement**

# Definition: QP4 Paragraph 2

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Defined in the Notice Section IV.A.4

Paragraph 2.i.

- Annual income that is less than or equal to 30% AMI, **AND**
- Experiencing severe cost burden (is paying more than 50% of monthly household income towards housing costs) **OR**

Paragraph 2.ii.

- Annual income that is less than or equal to 50% AMI, **AND**
- Evidence of housing instability tied to the specific condition (A)-(G) under At Risk of Homelessness Definition.

# Definition: Evidence of Housing Instability A-G

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room;
- (F) Is exiting a publicly funded institution, or system
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

# Key Components: QP4 Paragraph 2

## Paragraph 2.i:

- **Income**
  - 30% AMI and below
- **Cost burden**
  - Paying more than 50% annual income towards housing costs



**Income  
Requirement**

## Paragraph 2.ii:

- **Income**
  - 50% AMI and below
- **Housing Instability**
  - Meets condition A-G from at risk of homelessness



**Income  
Requirement**

# Case Scenario

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A HOME-ARP applicant on SSI is falling behind in their rent. Rental unit costs \$500 a month which is nearly 70% of their monthly income.



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# Case Scenario

## Living Situation

In housing where applicant is paying most of their income to rent



## Key Components

Status: QP4

Income

Cost Burden



## Preferred Order

Notice Section VIII.F.2.i preferred order required for income. No other order specified.



## Documentation

Income: SSI benefits letter

Cost Burden: Lease agreement with rental amount, calculation of % of SSI v. housing costs.



# Recordkeeping for Preferences and Methods of Prioritization (MoP)



# Steps for Documenting Preferences and MoP

## Identify

Clearly identify preference and method of prioritization, if applicable.

For subpopulation preferences, clearly define who is included in the subpopulation

## Key Components

Identify the key pieces of the definition where documentation efforts should be focused.

## Documentation

Determine what types of documents support the key elements of the preference definition and, if any preferred order will be required for obtaining documents.

# Preference Example: QP1 Veteran

After ensuring the household met the QP1 definition. What documentation would be needed for veteran status?

- Define what you mean by “Veteran”
  - What Discharge status will be accepted?
  - How many days minimum in Active Duty?
  - What about Reservist and National Guard?
- Documentation Options:
  - DD-214 or Veteran ID
  - Print out of veteran service record
  - Confirmation of veteran status in SQUARES
  - Letter from VA or other veteran services provider

**PJ should include definitions and acceptable documentation in:**

- 1. written agreements**
- 2. tenant & client selection plans**
- 3. policies and procedures.**

# MoP Example: Length of Time Homeless

After ensuring the household met the preference, what documentation is needed for the method of prioritization of length of homelessness?

- Define what you mean by “length of homelessness”.
  - How is it measured? Months?
  - Does it include all months in someone’s life, last 3 years, or current episode?
- Documentation Options:
  - Partner with homeless services providers as much as possible
  - Follow: third party verification, intake worker observation and self-certification
  - Consider the use of self-certification, how long of a period can someone self-certify

**PJ should include definitions and acceptable documentation in:**

- 1. written agreements**
- 2. tenant & client selection plans**
- 3. policies and procedures.**

# Documentation Takeaways



# Documentation Takeaways

## Collect only minimal information for QP3

- The written documentation need only include the minimum amount of information indicating that the individual or family meets QP3 definition, and need not include any additional details about the conditions that prompted that individual or family to seek assistance.
- Limit the inclusion of identifying information, such as names, in data entry and shared documents until necessary (i.e. signing a lease)

## Stay Low Barrier

- Resist the urge to put burden on participants to prove eligibility in situations where it is impossible to obtain third-party verification. Please note, this practice should be used sparingly.
- Partner and use systems that are the repository of reliable documentation to assist in eligibility determinations, after the PJ has ensured that such systems and information quality are acceptable.

# Documentation Takeaways

## Create Templates

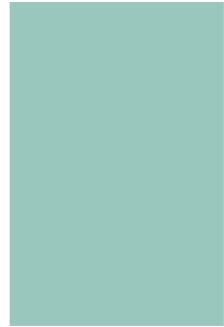
- Look to current forms and procedures as templates and tailor to both activities, and preferences/limitations
- Provide subrecipient/owner templates to assist in QP eligibility
- Ensure that definition differences between HOME-ARP and other programs are clear.

## PJ Oversight

- Clearly articulate in HOME-ARP written agreements the QPs to be assisted, including preferences/limitations, documentation standards
- Train in assessing eligibility
- Regularly review eligibility determinations to ensure correct determination of eligibility and implementation of preferences/limitations

# Documentation & Recordkeeping Tools

To assist with the recordkeeping requirements for QP status the following tools have been released:



## At-A-Glance QP definitions

- Intended for PJ and partner staff who need to know the full QP definitions
- Takes the technical QP definitions and formats them for easy at-a-glance readability



## QP Documentation Requirements

- Looks at the Key Components of each QP definition that must be documented
- Provides examples documentation for each component of the QP definition



## HOME-ARP QP Guide

- More graphic visualization of summarized QP definitions



# Questions?

