

Permanent Supportive Housing Admissions

An Overview for Housing Subsidy Administrators

Session 1: Eligibility & Documentation

Feb. 14, 2022

Purpose + Goals for Today

Welcome!

The City has begun a biweekly learning series to provide PSH administrators w/information, updates and tools you need to run your programs alongside the City.

Purpose: Ensure admissions to PSH are as swift as possible.

Goals for Today

1. Housing Subsidy Administrators (HSA's) learn current eligibility for permanent supportive housing (PSH)
2. HSA's learn the minimum documentation requirements to enroll someone in a PSH program.

Today's Agenda

- Welcome/Introductions
- Eligibility Requirements
- Minimum-required documentation
- Program Denial Policy
- Questions

Welcome: Boston PSH Learning Series

- Introductions (in the chat)
 - Name
 - Agency
 - Any training topics you are interested in
- Ashley, Technical Assistance Collaborative (TAC)

PSH Eligibility: The Dedicated Plus Definition



Chronic Definition Refresher

Situation	Documentation of Homelessness	Documentation of Disability
<p>Household is Chronically Homeless (12 Consecutive Months)</p> <ul style="list-style-type: none"> Homeless months must be in an emergency shelter, safe haven or unsheltered 	<ol style="list-style-type: none"> HMIS record or record from a comparable database; or Written observation by an outreach worker or shelter letter Written referral by another housing or service provider; or Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker’s documentation of the living situation and the steps taken to obtain the evidence listed above. If the head of household is currently staying in an institution where they have been for less than 90 days (120 days during HUD waiver) (and were in a shelter/street/safe haven immediately prior) their institutional stay can be documented by: <ol style="list-style-type: none"> Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of program participant's residence, or Where evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker’s documentation of the living situation and the steps taken to obtain the evidence listed above. <p><i>HUD clarifies that a single encounter in a month is sufficient to count for the entire month, unless there is clear evidence of a break (i.e. HMIS record of a transitional housing stay)</i></p>	<p>Documentation of the head of household’s disability, including:</p> <ul style="list-style-type: none"> Written verification of the disability from professional licensed by the state to diagnose and treat the disability; Written verification from the Social Security Administration; The receipt of a disability check (e.g. SSDI check or Veteran Disability Compensation); Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by evidence above; or Other documentation approved by HUD.
<p>Household is Chronically Homeless (4+ Occasions totaling 12 months over three years) *</p> <ul style="list-style-type: none"> Homeless months must be in an emergency shelter, safe haven or unsheltered 	<p>Same as above</p> <ul style="list-style-type: none"> Each separate occasion MUST be documented (minimum of three breaks). 100% of the breaks can be documented by self-report. A “break” must be at least 7 days 	

How does self certification work for the chronic definition?

- 100% of all households served by a PSH program can use self-certification to document periods of homelessness to document up to 3 months of homelessness.
- Only 25% of all households served by a PSH program can use self-certification as documentation for the full period of homelessness in the rare instances where persons have been unsheltered and out of contact for long periods of time. Attempts to obtain third-party documentation and the reason(s) that documentation was not obtained must be documented.
- At least 75% of households served in an operating year must have 3rd party documentation for 9 of 12 months of homelessness and self-certification may be used for the remaining months.

What is a DedicatedPlus Project?

All of Boston's PSH is now allowed to use the Dedicated Plus definition, where households must meet one of the following criteria at project entry. **Every household must have a disabling condition.** HUD Exchange program [link](#).

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 as defined at 24 CFR 578.3 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 transitional housing (TH) and rapid re-housing (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.

Quiz

Does the new Dedicated Plus definition require a disabling condition?

- Yes
- No
- Unsure

PSH Documentation Requirements



Minimum Documentation Needed for PSH

1. Dedicated + Homeless Status
2. Disabling Condition

-
- ✓ Income verification is NOT required at intake
 - ✓ For rent calculation purposes staff can use a low threshold of documentation

Documenting Homelessness for Ded+

HSA's must document

1. current homeless status unsheltered, in emergency shelter, or in a TH closing or VA homeless program AND

2. 12 months of homelessness in the last three years at a minimum + a disability (HUD requirement)

- Check warehouse record first- nights in warehouse are the first level of documentation
- Check uploads to the warehouse- assessors have been uploading documented self-report nights to warehouse record.
- Check with assessor; they may have documentation on file to share if they could not upload.
- Must document why you could not get the higher levels of documentation on the form.

Boston's Preferred Order of Documentation of Homeless Status
1. HMIS record of Boston bed/outside days
2. Third-party written documentation/ shelter letter
3. Oral verification to the intake worker (written by the intake worker)
4. Self-certification from the participant accompanied w/a PSH intake worker's reason for using self certification

[Template form for #2-4 can be found here.](#)

COVID-19 Interim Disability Certification Form

Continuum of Care Disability Certification Form (Interim COVID-19 Version)

Client Name: _____

Client SS#: _____ * If no SS#, please write date of birth _____

This agency is responsible for determining the eligibility of applicants who seek to participate in the Continuum of Care Program.

Has a disability, as defined in Section 223 of the Social Security Act [42 USC 423] defines disability as:

- "Inability to engage in any substantial, gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months," or
- "In the case of an individual who attained the age of 55 and is blind and unable by reason of such blindness to engage in substantial, gainful activity requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time."

Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:

- Is expected to be of long-continued and indefinite duration;
- Substantially impedes his or her ability to live independently, and
- Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or

Has a developmental disability as defined in 42 U.S.C. 6001. Section 102(7) of the Developmental Disabilities Assistance and Bill of Rights Act [42 U.S.C. 6001(7)] defines developmental disability in functional terms as:

"Severe chronic disability that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the person attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitation in three or more of the following areas of major life activity: (1) self-care, (2) receptive and responsive language, (3) learning, (4) mobility, (5) self-direction, (6) capacity for independent living, and (7) economic self-sufficiency; and
- Reflects the person's need for a combination and sequence of special, interdisciplinary, or generic care, treatment, or other services which are of lifelong or extended duration and are individually planned and coordinated."

Other: _____

's definition does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the origin agent for acquired immunodeficiency syndromes. I certify that to the best of my knowledge and belief the above information is correct.

Healthcare Provider Certification Option

(Health Care Provider Signature, Name and Title) (License Number) (Date)

Participant Self Certification Option

I certify I have a disabling condition that meets one of the above criteria (check off the above criteria that apply). Self-certifications can be used until the public health crisis is deemed over, locally.

(Participant Signature) (Printed Name) (Date)

Intake Worker Observation of Disability

Where the participant has a disabling condition that meets one of the above criteria (check off the above criteria that apply). Observation can be used until Sept. 30, 2020.

(Participant Signature) (Printed Name) (Date)

Staff: If using self-certification or your own observation, explain why third party documentation was unable to be obtained during the COVID-19 crisis.

- May use existing methods of healthcare provider and/or disability benefits. [See sample form here.](#)

- The current [HUD waiver](#) allows for intake worker observation or self-certification through 03/31/2022 (pages 10-11).

- If you use self-certification or your own observation, use space on form to explain why you had to use it.

Income Verification for Rent Calculations

Reminder: CoC programs do not have an income requirement at intake

For purposes of rent calculation, use [HUD Part 5](#) documentation requirements; may use:

- Third party, written verification
- Third party, verbal verification
- Third party, electronic verification (email, website)
- Third party, delivered by the tenant
- If you viewed the documents but could not get copies for the file, you may list what you viewed as evidence
- Notarized statement from tenant verifying income
- Self-affidavit from tenant verifying income

Bottom line: Attempt highest thresholds of documentation; document why you could not obtain

Quiz

Does income verification need to be obtained before we enroll someone in a PSH program?

- Yes
- No
- Unsure

Quiz

When will the HUD waiver allowing self-certification for disabling condition expire?

- 2/28/2022
- 3/31/2022
- 6/30/2022
- 9/30/2022

Quiz

What do we have to do before using self certification of time spent homelessness?

- a) Check warehouse, contact shelter navigators, try to obtain written or verbal verification from another agency/entity
- b) Check warehouse, contact shelter navigators, try to obtain written or verbal verification from another agency/entity and document all of our attempts
- c) Check the warehouse
- d) Check the warehouse and document the nights were not in the warehouse

Program Denial Policy



Program Denial Policy-Rationale

The Boston CoC promotes access for all eligible households in need of housing by overseeing an objective referral process in which all eligible households are treated in a consistent manner.

[See the full policy here](#)

Program Denial Policy

- The HSA/SSP must adhere to the CoC program denial policy.
- The CoC program does not impose any additional screening criteria other than eligibility, so programs may not add additional screening criteria.
- Development Officers will monitor projects for Housing First fidelity, which will include ensuring admissions processes are as low barrier as possible.

Reasons for Denial

- a. **Household did not respond after initial acceptance of match.** *The HSA/SSP must document a minimum of 5 business days where they attempted to reach the shelter contact via email and phone with no response.*
- b. **Ineligible for Housing Program** – a referral was made based on the household’s apparent eligibility, but due to overlooked or undisclosed information, the household is not eligible for the program.
- c. **Client refused offer-** a household refused the available resources after speaking with the housing provider and learning more about the program and unit.
- d. **Self-resolved-** household has found permanent housing.
- e. **Falsification of documents-** The household presented falsified documentation to the project.
- f. **Additional screening criteria imposed by third parties:** The unit is a project-based or sponsor-based program that is subject to a third party’s screening criteria (ex. a project-based site that made a commitment during development to establish additional screening criteria, or a sponsor-based site where a third party landlord has additional screening criteria).

2 Step Denial: Health + Safety Reason

g. **Health and Safety:** Based on a household's exhibited behavior, enrollment in the project would result in a significant health and safety risk. This means a participant may not be denied solely on information derived from background checks.

- A denial of this nature is only applicable when a participant has displayed behavior to the project, housing navigator, or other provider staff that warrants a legitimate health or safety concern for the project.
- Prior to denying a referral based on health or safety reasons, the HSA/SSP must follow a **two step process**.

Reasons for Denial

Step 1:

- Attempt to Resolve Concern with Applicant: Request documentation from the household and/or meet with the household to discuss the circumstance and any changes that have occurred to improve the health or safety risk.
- Documentation requested must be as low-threshold as possible for the household to retrieve quickly and for only the most serious offenses;
- HSA are required to accept and review self statements as a potential source of documentation to explain the risk.
- Households cannot be required to enter into service contracts or provide proof of service or treatment participation as a condition of acceptance into the unit.
- **If the meeting satisfies the HSA/SSP's concerns, they do not need to proceed to the next step and may accept the household immediately.**



Timeline

HSA/SSP must adhere to the CAS timeline of 4 business days between accepting a referral and logging an admission decision in the CAS database.

Reasons for Denial

Step 2:

- Schedule a Case Conference: If a household's explanation does not satisfy the HSA/SSP, prior to issuing a denial, the HSA/SSP must first set up a case conference through the CE Manager (currently Ian Gendreau).
- Members from the Housing Stabilization Leadership team will be asked to participate; representatives from the household's housing navigation team (the navigator and supervisor) must also be present.
- **The goal of the case conference is to leverage system partners to find solutions or other possible housing pathways for the household, with the goal of either reversing the denial or finding another possible housing placement.**

Reasons for Denial

Step 2 (cont.):

- The HSA/SSP may deny a referral based on health or safety concerns if an alternative housing pathway or solution cannot be found through the above case conferencing. No rejection is ever permanent- the participant will remain on the CAS queue for future housing openings, including openings that originate with the denying project.
- The original HSA/SSP who denied the referral will be asked to reconsider any changes in the applicant's exhibited behavior if the applicant is re-referred to a new opening the project administers.
- **Please note that the health and safety reason for denial should be used in the rarest of cases; it is expected that approximately five case conferences of this nature will happen per year per type of housing, across all of the HSA/SSPs**

Documenting a Denied Referral

- Any denial must be documented in the database by selecting the corresponding check box at the “Housing Subsidy Administrator CORI Hearing” stage in CAS.
- To deny a referral in CAS, check the corresponding reason for denial box in CAS. Selecting the “other” box will require the HSA to detail the reason for the decline.
- The City will follow-up with the housing program and shelter contact in order to understand the circumstances of the decline.
- The shelter contact is responsible for contacting the client with the details of the denial. The housing provider must inform the household of the reason for denial and grievance/appeal rights in writing. A copy of this letter should be emailed to all parties included on the initial CAS match at the same time that the letter is sent to the applicant to expedite the appeal process.

Takeaways from Today

1. Participants only need to fit the Dedicated Plus definition for admission. This includes proof of disability.
2. Proof of income is not required to admit someone into the program.
3. PSH programs must follow the city-wide program denial policy, which includes a case conference for health and safety concerns.

Questions?

