



## Community Shelter Board (CSB)

### Documentation of Homelessness & Risk of Homelessness

Aligned with CSB Monitoring Handbook & FY26 Subrecipient Monitoring Guide

Final 05/01/2026

#### Purpose

This document provides Partner Agencies with clear, consistent guidance for documenting homelessness and risk of homelessness in alignment with HUD requirements, the CSB Monitoring Handbook, and the FY26 Subrecipient Monitoring Guide.

#### General Requirement

Documentation of homelessness or risk of homelessness is required for all clients at program entry. Documentation must be complete, verifiable, and retained in the client record and/or HMIS (Clarity). Incomplete or missing documentation may result in monitoring findings and potential repayment of funds.

#### Literally Homeless (Category 1)

Street Outreach, Emergency Shelter, Transitional Housing (TH), Rapid Re-Housing (RRH), and Permanent Supportive Housing (PSH) programs serve individuals and families who are literally homeless. This includes individuals staying in emergency shelter or places not meant for human habitation.

#### Preferred Documentation Method (HMIS)

The preferred and most reliable documentation is HMIS program history. Agencies must:

- Enroll the client in HMIS at intake
- Verify an open Shelter or Outreach enrollment within 7 days prior to program entry
- Maintain documentation of program history in the client file

HMIS documentation must align with the client record and reflect accurate entry dates and living situations.

#### Additional Documentation (If HMIS is Insufficient)

If HMIS documentation is not available or sufficient, one or more of the following must be obtained:

- Verification of Street Homelessness form (completed by approved Outreach provider)
- Written third-party certification from another provider
- Institutional discharge documentation (if <90 days)

- Client self-certification (last resort only; must include documentation of attempts to obtain third-party verification)

### **Risk of Homelessness (Prevention Programs)**

For Homelessness Prevention and CARR programs, all three elements below must be documented:

1. Evidence of imminent housing loss
2. Evidence of no alternative safe housing (self-certification allowed)
3. Evidence of lack of financial resources (self-certification allowed)

### **Fleeing or Attempting to Flee Violence**

Clients fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous conditions may qualify. Documentation must show:

- Experience of violence or unsafe conditions
- No safe alternative residence
- Lack of resources or support to obtain housing

Due to safety concerns, self-certification may be more common in these situations.

### **Special Considerations**

- Movement between unstable locations may still qualify as literal homelessness
- Temporary stays prior to housing (RRH/PSH) must be documented if exceeding 30 days
- Breaks in shelter stays greater than 7 days may require re-verification
- Enrollment in Coordinated Entry alone is not sufficient documentation

### **Monitoring Expectations**

Documentation will be reviewed during PR&C monitoring. Agencies must demonstrate:

- 100% compliance for eligibility documentation
- Alignment between HMIS and file documentation
- Clear and defensible verification methods

This aligns with HUD expectations and CSB's risk-informed monitoring framework.

### **Technical Assistance**

For complex or unclear situations, agencies should contact CSB for guidance prior to enrollment decisions.