

ESG FAQs

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What is acceptable documentation of eligibility for homeless individuals and families at a nightly turnout emergency shelter, and when is it required?

The recordkeeping requirements found in §576.500 require recipients to maintain and follow written intake procedures to determine whether potential program participants meet the homeless definition found in §576.2. These procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status.

Therefore, recipients and subrecipients are required to document eligibility at program entry, even for emergency shelters. However, HUD recognizes that third-party documentation at the emergency shelter level is not feasible in most cases. For shelters where program participants may stay only one night and must leave in the morning, documentation must be obtained each night. If program participants may stay more than one night, then documentation must be obtained on the first night the household stays in the shelter.

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. ***Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.***

Note that this is a different standard for recordkeeping than is required for all other types of assistance. For all other types of assistance funded under the ESG Program, the interim rule establishes the following order of priority for obtaining evidence:

1. Third-party documentation, including written and source documentation, and HMIS records;
2. Intake worker observations;
3. Certification from persons seeking assistance.

Note: Emergency shelter providers do need to enter each individual or family seeking emergency shelter into HMIS. However, the intake process should be able to be done fairly quickly. HUD does not require the same level of intake assessment at entry to an emergency shelter – especially a “nightly turnout” shelter – as for a Rapid Re-housing or Homelessness Prevention program. HUD

only requires the uniform data elements at entry. If emergency shelters want to complete a vulnerability index or similar assessment to help understand and address each individual or family's needs, this does not need to be done at intake and could be conducted at a later time.

For more information about recordkeeping requirements for the homeless definition, please view the *Determining Homeless and At-Risk Status, Income and Disability Webinar* (<https://www.hudexchange.info/resource/1953/determining-homeless-and-at-risk-status-income-and-disability-webinar>).

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Emergency Solutions Grants (ESG) Program

Program Requirements

Expenditures and Recordkeeping

Links in This FAQ

Determining Homeless and At-Risk Status, Income and Disability Webinar

(<https://www.hudexchange.info/resource/1953/determining-homeless-and-at-risk-status-income-and-disability-webinar>)