

Miami-Dade County Homeless Trust

Third Party Documentation By Community Members, Law Enforcement, Libraries, Healthcare Providers and Non-CoC Shelters

BACKGROUND

The [Final Rule on Defining “Chronically Homeless”](#) allows third parties such community members (e.g. business owners, property owners, residents), law enforcement, libraries, and health and service providers to document episodes of homelessness to determine if they are chronically homeless.

HUD issued guidance on acceptable community-at-large third-party verification¹ in the form of a Frequently Asked Question (FAQ):

A. Can community members such as shopkeepers, owners or residents verify homelessness?

An intake worker may accept as third-party documentation, the oral or written observation of someone in the community, including but not limited to, a shopkeeper, a building owner, or a neighborhood resident (regardless of relationship with the household) that has ***physically observed*** where the individual or head of household is or has been residing. If the community member is unwilling to provide a written observation, the intake worker may document their conversation with the community member. The community member must indicate which specific months they ***physically observed*** the individual or head of household residing in a place not meant for human habitation. The intake worker must use their professional judgment to determine if the source is reliable.

B. Can we accept verification of homelessness by housing or service providers such emergency shelter staff, members of law enforcement, or healthcare professionals?

Another housing or service provider may provide a referral of the individual or head of household's current or prior residence in an emergency shelter, safe haven, or place not meant for human habitation. HUD considers other housing or service providers to include members of law enforcement, a healthcare professional within the community, an educator, or another person that has encountered the individual or head of household while in their official capacity and not simply as a member of the community. If the other housing or service provider is not able to provide a written referral or observation, the intake worker may document their conversation with the housing or service provider. The housing or service provider's written referral or observation may only qualify as third-party documentation for the specific months in which they encountered the individual or head of household.

¹ U.S. HUD FAQ ID: 2756 Published: April 2016

Trust Policy and Procedures:

The Trust Orders of Priorities set policy on homeless verification. The Homeless Trust's Coordinated Entry practice predominately relies upon individual record of a stay in an emergency shelter, a safe haven, or from a street outreach encounter captured in the CoC's HMIS, but we also allow:

- another CoC's HMIS records (may account for the full 12 months so long as the record was in the past three years)
- third-party documentation in accordance with **Section A** below (may account for the full 12 months so long as the record was in the past three years)
- self-certification of homelessness (can only account for 25% of their homeless verification, 3 of the 12 months)

A. Procedures

The following procedures apply to homeless verifications by third parties. Third-parties may include community members (e.g. business owners, property owners, residents, other community members), law enforcement and health and service providers to document episodes of homelessness.

1. All third party verifications by community members must be done in writing using the Homeless Trust [Third Party Verification form](#).
2. Anyone completing third party verifications must verify an individual is experiencing homelessness based on their own direct observation. Direct observation must be described in the Third Party Homeless Verification Form and must include descriptions of where a person is sleeping/living. An individual simply stating they are homeless does **not** qualify as an observation.
3. Third party verifications must be uploaded onto HMIS.

B. Counting Months of Homelessness Based on Third Party Verification

Examples of counting months of homelessness based on third-party and self-certification:

- A disabled community member was entered into HMIS by the Library Access Point in October (current month). Law enforcement personnel witnessed the individual or head of household residing in a place not meant for human habitation in the months of January and September and provides a Third Party Verification Form detailing those encounters, including the approximate date in which each encounter occurred. The individual or head of household may report through self-certification of homelessness that they remained homeless during the months of February, March, April, May, June, July and August, but only three (3) of those months will count towards their homeless longevity. This individual's records would count for six (6) months of homelessness (one month in HMIS, two months through third-party verification and three months through self-certification).
- A disabled individual or head of a household visited the Pridelines in late January and was added onto their HMIS Access Point. They return to the Drop-In Center in March and June. They now ask to be prioritized for Permanent Supportive Housing. Based on their HMIS record, they have six (6) months of homelessness because SO teams and Access Points may keep people experiencing homelessness open in HMIS so long as they have one encounter every 90 days. The individual or head of household may report through self-certification of homelessness that

they were homeless for twelve months prior to connecting with Pridelines, but only three (3) of those months will count towards their homeless longevity. Their record would count as nine (9) months of homelessness.

- An emergency shelter that does not participate in the CoC's HMIS may provide a written observation stating that the individual or head of household resided there from May 4th through June 20th. That record would count as two months of residing in an emergency shelter.