Rebuilding Lives Eligibility Determination: Criteria, Verification and Documentation Standards

Rebuilding Lives permanent supportive housing (RL PSH) projects are intended to provide service-enriched permanent housing for families including, but not limited to a single person or a group of persons residing together, with or without children with identified special needs that experience long-term homelessness. The following criteria, verification standards, and documentation requirements are intended to guide the eligibility determination process for long-term homeless families with or without children seeking a Rebuilding Lives housing unit.

Persons interested in applying to live in RL PSH must have a Provider Agency complete an Eligibility & Prioritization form to verify that they meet RL PSH criteria. Forms must be completed and signed by a representative of a referring program or the RL PSH program which is processing a referral. RL PSH programs must verify eligibility at intake and again at the time of admission (i.e. move-in, lease signing) to the RL PSH program to ensure applicants are eligible prior to entry. Eligibility documentation, as described below, must be attached to the Eligibility & Prioritization form and kept in the applicant/tenant file.

Definitions

Rebuilding Lives (RL) is defined as a homeless household, including an individual or group of persons presenting together with or without children, where the Head of Household is an individual with a disability that has a cumulative length of time spent homeless, whether in shelter or on the street or a combination of the two, totaling at least 120 days or has had at least 4 occasions of homelessness where the combined occasions total at least 120 days and each break in homelessness included at least 7 consecutive nights.

Families presenting together with children, living in a direct housing/rapid re-housing unit currently supported by Community Shelter Board are still considered eligible as Rebuilding Lives families if they meet the eligibility criteria.

HUD defines a Chronically Homeless (CH) as a homeless household with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the care facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. The individual must have been living as described above continuously for at least 12 months, or on at least 4 separate occasions in the last 3 years, where the combined occasions total a length of at least 12 months and each break in homelessness included at least 7 consecutive nights. (HUD Final Rule: Defining Chronically Homeless, December 4, 2015)
A. Criteria
To be eligible for Rebuilding Lives Head of Household must meet the following criteria:
1. Be homeless (or living in a direct housing/rapid re-housing unit for families) at time of admission into Rebuilding Lives supportive housing.
2. Have experienced long-term homelessness.
3. Be an individual with a disability.
4. Be a resident of Franklin County, Ohio.
5. Be a US citizen, national or noncitizen with eligible immigration status.
6. Meet HUD’s definition of “extremely low income”.

Note: The criteria above, applies for HUD Chronically Homeless housing as well.

1. Homeless at Time of Admission
Rebuilding Lives clients must be homeless at the time of admission into the program.

Rebuilding Lives Homeless Definition
The term “homeless family” includes an individual or group of people presenting together as a family, with or without children who, immediately prior to admission, come from:
\(\text{\checkmark}\) places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;
\(\text{\checkmark}\) an emergency shelter;
\(\text{\checkmark}\) transitional housing for homeless persons who resided in a place not meant for human habitation or emergency shelter immediately prior to entry. Transitional housing stay does not count towards meeting the required number of homeless days or count of occasions;
\(\text{\checkmark}\) Rapid re-housing units for families currently sponsored by Community Shelter Board and VA-funded Supportive Services for Veteran Families (SSVF) provider programs.

Note: Transitional housing for homeless persons is not an eligible prior residence for HUD funded units serving clients required to meet HUD Chronically Homeless criteria, unless they were accepted by PSH prior to entry into Transitional Housing and a Transitional Housing stay of less than 90 days is needed to identify the housing unit or they are a VA funded Grant per Diem (GPD) participant with prior documentation of homeless time that to qualify as HUD Chronically Homeless.

Note: If a person is in one of the four categories listed above, but most recently spent less than 90 days in a jail or institution, he/she qualifies as coming from one of these three categories.

Examples of Institutions:
\(\text{\checkmark}\) Prison
\(\text{\checkmark}\) Jail
\(\text{\checkmark}\) Inpatient Psychiatric Hospital: Public (TVBH) or Private (OSU Upham Hall, Ohio Hospital for Psychiatry, Riverside, etc.
\(\text{\checkmark}\) ADAMH Netcare Crisis Stabilization Unit (CSU)
\(\text{\checkmark}\) ADAMH Netcare Miles House
\(\text{\checkmark}\) ADAMH Residential Care Facility (RCF)
\(\text{\checkmark}\) Nursing Home
**Note:** For emergency shelter, date of shelter exit must be no more than 7 days prior to RL PSH entry date. In these instances, the living situation immediately prior to RL PSH entry may be defined as ‘Emergency Shelter’.

**Who is NOT Considered Homeless?**

Persons who are:

- in housing or the housing is substandard and in need of repair or the housing is crowded, with the exception of families living in rapid re-housing/direct housing units currently sponsored by the Community Shelter Board
- incarcerated, not homeless prior to entry.
- living with relatives and friends
- living in an adult congregate living facility or similar place
- being discharged from an institution which is required to provide or arrange housing upon release
- utilizing housing vouchers

**2. Long-Term Homelessness**

Rebuilding Lives clients must have experienced *long-term homelessness* and meet the long-term homeless criteria as defined in the Rebuilding Lives Plan.

**Rebuilding Lives Long-Term Homeless Definition**

Long-term homeless refers to the length of time spent homeless and the total number of separate homeless occasions.

- **Length of Stay**
  
  A homeless household, including an individual or group of persons presenting together with children is characterized as a “long-term stayer” under Rebuilding Lives when the Head of Household has a cumulative length of time spent homeless, whether in shelter or on the street, in a rapid re-housing (for families with children) unit currently sponsored by the Community Shelter Board or rapid re-housing (for Veterans) unit currently sponsored by the Veteran’s Affairs in any combination, totaling at least 120 days.

  Note: For HUD funded projects, individuals may be considered “chronically homeless” if they have been continuously homeless for a year or more totaling at least twelve (12) months.

- **Occasions**
  
  Long-term homeless under Rebuilding Lives can also be defined by at least four (4) separate occasions of homelessness cumulatively totaling at least 120 days. A homeless occasion refers to time spent either in a place not meant for human habitation, a safe haven, an emergency shelter, or in an institutional care facility if the individual has been living in the care facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. Separate homeless occasions are separated by at least seven (7) days.
Note: For HUD funded projects, individuals may be considered ‘chronically homeless’ if they have experienced at least four (4) separate occasions of homelessness in the past three (3) years as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of non-homelessness. Breaks in homelessness of less than 7 consecutive days can be counted and included in occasions.

Eligibility must be determined and documented using Columbus ServicePoint records. CHOICES for Victims of Domestic Violence may submit verification of residency on agency letterhead.

If the client comes from a place not meant for human habitation, such as cars, parks, sidewalks and abandoned buildings, a Verification of Street Homelessness Form must come from an approved outreach provider.

3. Disability
Rebuilding Lives clients must be disabled.

Rebuilding Lives Disability Definition
Disability refers to any one or combination of multiple special needs that substantially impede the success of a client obtaining or maintaining housing. Such disabilities include serious mental illness, diagnosable substance use disorder, a long-term health disorder or developmental disability, including the co-occurrence of two or more of these conditions. The condition must be one which limits an individual’s ability to work or perform one or more activities of daily living.

- **Serious Mental Illness:**
  The person has a substantial history of a mental disability which also has required recent hospitalization; or multiple or lengthy hospitalizations in the past; or extensive community treatment and support services over a sustained period of time; or the persons exhibits signs and symptoms of a mental disability of sufficient severity to limit the person’s ability to perform one or more activities of daily living.

- **Substance Use Disorder:**
  The person has a substantial history of at least one year of physiological dependence upon mood-altering chemicals, with or without prior treatment occasions, and evidence of substantial life losses to the extent that it interferes significantly with social, economic and/or physical functioning, inclusive of suitable living arrangements, as a result of substance abuse.

- **Persons with Long-term Health Disorders or Developmental Disabilities:**
  The person has a long-term health disorder which (1) is expected to be of long-continued and indefinite duration, (2) substantially impedes his/her or their family’s ability to live independently, and (3) is of a nature that such ability could be improved by more suitable housing conditions, including individuals who are disabled as a result of HIV infection or AIDS; or the person has a developmental disability.
Note: For HUD funded projects, individuals may be considered “disabled” if they are diagnosed with one or more of the conditions listed above.

B. Documentation and Verification Standards

Homelessness and Long-Term Homelessness

Use the following standards and verification process to determine appropriate eligibility documentation to secure. All documentation must meet these standards and must be attached to the Eligibility & Prioritization form.

<table>
<thead>
<tr>
<th>Living Situation Immediately Prior to RL PSH Entry</th>
<th>Homeless per RL Criteria?</th>
<th>Long-Term Homeless per RL Criteria?</th>
<th>Acceptable Verification Types</th>
<th>Standards and Verification Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Shelter</td>
<td>Yes</td>
<td>Depends</td>
<td>A. CSP record of shelter stay.</td>
<td>A. CSP:</td>
</tr>
<tr>
<td>Providers that do not use CSP include:</td>
<td></td>
<td></td>
<td>OR</td>
<td>Print CSP “Entry/Exit” page showing shelter stay/records with past shelter stays and current shelter exit date. CSP record must document shelter exit date that is no more than 7 days prior to RL PSH admission (entry date).</td>
</tr>
<tr>
<td>CHOICES for Victims of Domestic Violence</td>
<td></td>
<td></td>
<td>B. Letter from third party shelter provider that does not use CSP (e.g. CHOICES).</td>
<td>Attach CSP page printout to the Eligibility &amp; Prioritization form.</td>
</tr>
</tbody>
</table>

B. 3rd Party Letter – providers that do not use CSP:

- Obtain letter from shelter provider.
  - *Letter Must:*  
    - Be on shelter provider letterhead  
    - Identify shelter program  
    - List past and current shelter stays including entry and exit dates  
    - Document shelter exit date that is no more than 7 days prior to RL PSH admission (entry date).  
    - Be signed and dated by shelter provider

- Attach 3rd party letter to the Eligibility & Prioritization form.
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</table>
| Homeless on the Street                            | Yes                      | Depends                           | A. CSP record of outreach engagement. | A. CSP:  
  - Print CSP “Entry/Exit” page showing active outreach record.  
  - Attach CSP page printout to the Eligibility & Prioritization form |
| Outreach Providers include:                       |                          |                                   | B. Verification of Street Homelessness Form (http://www.csbs.org/providers/housing-materials) | B. Verification of Street Homelessness form:  
  - Form verifies:  
    - Client name  
    - Contact dates with outreach worker  
    - Client’s length of time living on the streets  
    - Zip codes of where client has been living  
    - Locations (i.e. car, sidewalk) where client is living  
    - Outreach worker name, signature, and date  
    - Outreach agency name  
  - Attach Verification of Street Homelessness form to the Eligibility & Prioritization form. |
<p>| Capital Crossroads                                 |                          |                                   |                             |                                  |
| Maryhaven Outreach                                 |                          |                                   |                             |                                  |
| Mt. Carmel Mobile Unit                             |                          |                                   |                             |                                  |
| Southeast PATH and HOST Outreach                  |                          |                                   |                             |                                  |
| Veterans Administration (VA) Outreach Unit         |                          |                                   |                             |                                  |</p>
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</table>
| Transitional Housing                              | Only if verifiably homeless immediately prior to entry. | No.                               | A. CSP record of transitional housing stay. | A. CSP:  
  - Print CSP “Entry/Exit” page showing transitional housing stay/record with transitional housing exit date.  
  - Attach CSP page printout to the Eligibility & Prioritization form.  
  - Must provide additional documentation and attach to Eligibility & Prioritization form that shows that the household was living in an emergency shelter or on the street immediately prior to admission to the transitional housing program. See above for acceptable forms of verification for each.  
  - The transitional housing stay does not count towards meeting the long-term homelessness criteria (required number of homeless days or count of occasions). |
<p>| Huckleberry House: Transitional Living Program     |                          |                                    |                              |                                  |
| Maryhaven Women’s Program at Noe Bixby             |                          |                                    |                              |                                  |
| Southeast Bridge to Success                       |                          |                                    |                              |                                  |
| YMCA/ADAMH Transitional Housing                   |                          |                                    |                              |                                  |
| Volunteers of America: Support, Recovery &amp; Education Program |                          |                                    |                              |                                  |
| VOAGO VA Grant Per Diem-GPD                       |                          |                                    |                              |                                  |</p>
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| Rapid Re-housing, including VA-funded Supportive Services for Veteran Families (SSVF) provider programs | Only if verifiably homeless immediately prior to entry. | Depends | A. CSP record of stay. | A. CSP:  
- Print CSP “Entry/Exit” page showing active rapid re-housing/direct housing stay/record.  
- Attach CSP page printout to the Eligibility & Prioritization form.  
- Must provide additional documentation and attach to Eligibility & Prioritization form that shows that the household was living in an emergency shelter or on the street immediately prior to admission to the Rapid Rehousing/Direct Housing Program and that the client meets the RL long-term homelessness criteria. See above for acceptable forms of verification for each. |
<p>| Homeless Families Foundation (HFF) Direct Housing | | | | |
| LSS SSVF | | | | |
| The Salvation Army Direct Housing | | | | |
| The Salvation Army Job2Housing | | | | |
| VOAGO SSVF | | | | |
| VOAGO Transition in Place | | | | |</p>
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<th>Standards and Verification Process</th>
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</thead>
<tbody>
<tr>
<td>Institutions</td>
<td>Only if verifiably homeless immediately prior to entry.</td>
<td>Depends</td>
<td>A. CSP record of emergency shelter or transitional housing stay. <strong>OR</strong> B. Verification of Street Homelessness Form (<a href="http://www.csb.org/providers/housing-materials">http://www.csb.org/providers/housing-materials</a>) <strong>AND</strong> C. Exit paperwork from the institution.</td>
<td>Must have met the definition of literal homelessness prior to entry and have resided in the institution less than 90 days. <strong>A. CSP:</strong> Print CSP “Entry/Exit” page showing emergency shelter or transitional housing stay/record or active outreach record with exit date. CSP record must document exit date that is less than 90 days prior to RL PSH admission (entry date). <strong>B. Verification of Street Homelessness form:</strong> Form verifies: o Client name o Contact dates with outreach worker o Client’s length of time living on the streets o Zip codes of where client has been living o Locations (i.e. car, sidewalk) where client is living o Outreach worker name, signature, and date o Outreach agency name <strong>C. Exit Paperwork:</strong> Obtain exit paperwork from the institutional care facility clearly documenting entry, admission and exit/discharge dates. Must document exit date that is less than 90 days prior to RL PSH admission (entry date). <strong>Attach exit paperwork to the Eligibility &amp; Prioritization form.</strong> Institutional stays of less than 90 days count towards meeting the long-term homelessness criteria (required number of homeless days and count of occasions).</td>
</tr>
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<tr>
<td>Living with Family Member or Friend</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
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<tr>
<td>Owns Home</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
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<tr>
<td>Renting (apartment, etc.)</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
</tr>
<tr>
<td>Living in Substandard or Overcrowded Housing</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
</tr>
<tr>
<td>(HCHV) VA Community Contract Safe Haven Program (HCHV/SH)</td>
<td></td>
<td></td>
<td>Not Eligible</td>
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</tr>
<tr>
<td>HUD-funded Veteran’s Affairs Supportive Housing (HUD-VASH)</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
</tr>
<tr>
<td>SSVF Prevention</td>
<td></td>
<td></td>
<td>Not Eligible</td>
<td></td>
</tr>
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</table>
Disability
Eligible documentation includes: A signed Certification of Disability form or a SSI/SSDI award letter showing receipt of benefits. For any unit receiving a CMHA or HUD subsidy, Certification of Disability forms must be signed by an “Authorized Professional,” which is defined as a physician, advanced nurse practitioner (CNP or CNS), or a state licensed clinician. State licensed clinicians must be independently licensed by the Ohio Counselor, Social Worker and Marriage and Family Therapist Board and can include counselors and/or social workers (LPCC, LICDC or LISW). For CMHA housing, disability based solely on any drug or alcohol dependence is not acceptable. For non-CMHA or non-HUD subsidized units an LSW signature is acceptable as well.

The certification (1) identifies the physical, mental or emotional impairment, why it is expected to be of long-continued or indefinite duration, how it impedes the individual’s ability to live independently, and how the individual’s ability to live independently could be improved by more suitable housing conditions; (2) identifies a developmental disability; or (3) identifies AIDS or related conditions.

Note: Disability Documentation may be dependent on the specific subsidy requirements for a project/unit.

Note: Projects that are funded through HUD must maintain documentation of disability per HUD standards.
### C. Rebuilding Lives vs. HUD Chronic Homeless eligibility

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Rebuilding Lives</th>
<th>HUD Chronic Homeless</th>
</tr>
</thead>
</table>
| **Homeless at time of admission**             | Households (including individuals or persons presenting together, as a family with or without children) where the Head of Household, immediately prior to admission, come from:  
   - places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;  
   - an emergency shelter;  
   - transitional housing for homeless persons and who originally came from the streets or emergency shelter  
   - Rapid re-housing (for families with children and Veterans only)  
   - Institution, if less than 90 days and homeless at admission to institution. | Households (including individuals or persons presenting together, as a family with or without children) where the Head of Household, immediately prior to admission, come from:  
   - places not meant for human habitation, such as cars, parks, sidewalks, and abandoned buildings;  
   - an emergency shelter  
   - Rapid re-housing (for families with children and Veterans only)  
   - Institution, if less than 90 days and homeless at admission to institution. |
| **Long-term homelessness**                    |                                                                                                                                                                                                               |                                                                                                                                                                                                               |
| Length of Stay                                 | Cumulative length of time spent homeless, whether in shelter or on the street or a combination of the two (rapid re-housing and families with children and Veterans), that is at least 120 days. | Continuously homeless, whether in shelter or on the street or a combination of the two, for at least 12 months.                                                                                                  |
| Occasions                                      | At least four (4) separate occasions of homelessness cumulatively totaling at least 120 days. A homeless occasion refers to time spent either on the street or in shelter. Separate homeless occasions are separated by at least seven (7) days. | At least four (4) separate occasions of homelessness in the past three (3) years cumulatively totaling at least twelve (12) months. A homeless occasion refers to time spent either on the street or in shelter. Separate homeless occasions are separated by at least seven (7) days. |
| Disability                                     | Documented:  
   - Serious Mental Illness  
   - Substance Use Disorder  
   - Chronic physical illness or disability (including HIV/AIDS diagnosis) or  
   - Developmental Disability | Documented:  
   - Serious Mental Illness  
   - Substance Use Disorder  
   - Chronic physical illness or disability (including HIV/AIDS diagnosis) or  
   - Developmental Disability |