



## Memo to CES Leadership and Case Conferencing on Documentation of Disability and Documentation of Homelessness

**By: Natalie Roberts**

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In the past few weeks, the City of Indianapolis Continuum Of Care Team received some inquiries about disability and homelessness documentation. This memo serves to clear up any questions or issues, and make a recommendation for future documentation.

### Disability Documentation

Under [24 CFR 578.103 \(a\)\(1\)\(i\)](#), there are five types of documentation accepted by the US Department of Housing and Urban Development (HUD) for documenting an individual's disability. The following documentation include:

- (1) Written verification of the disability from a professional licensed by the [state](#) to diagnose and treat the disability and his or her certification that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently;*
- (2) Written verification from the Social Security Administration;*
- (3) The receipt of a disability check (e.g., Social Security Disability Insurance check or Veteran Disability Compensation);*
- (4) Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, is confirmed and accompanied by evidence in paragraph (a)(4)(i)(B)(1), (2), (3), or (5) of this section; or*
- (5) Other documentation approved by HUD.*

To note: HUD does NOT have a time associated with these documents. This means that older documents (not within the last year) may count towards disability documentation. However, disability and ability can change over time. Here is my recommendation for disability documentation.

Recommendation: The recommendation is that if a client has any acceptable disability documentation that is over 2 years old, that documentation is valid. The documentation needs to be accepted and the client placed on the priority listing and/or referred for services.



Clients should NOT be denied placed on priority listing or referred to PSH projects for older disability documentation.

However, because clients' needs may change over time, the disability documentation should be updated within 45 days of enrollment with any of the HUD approved documentation. This ensures that clients needs are being assessed and will show (when monitored), that projects did do due diligence in having documentation of disability.

If accepted, this recommendation should be approved and added to the Written Standards and Coordinated Entry Policies and Procedures.

### **Homelessness Documentation**

[24 CFR 578.103](#), describe all documentation for homelessness. [The CES Policies and Procedures](#) determine time frame and appropriate documentation for homelessness needed in the Indianapolis Continuum of Care.

On page 16 of the policies and procedures, the Eligibility Section states:

*Households with documentation verified by the System Lead within the last six (6) months may be referred into a housing program. **After 6 months, additional information will be required to verify that the household is still homeless in order to be referred into a housing program.** The household will be required to provide the housing program with updated homeless documentation if there are gaps prior to program enrollment.*

As long as homelessness documentation was completed within the last 6 months, clients are eligible to be referred and accepted into housing programs. If documentation is older than 6 months, wither system navigators can provide updated documentation (in addition to the initial documentation) or the housing provider can update homelessness documentation. Clients should NOT have services delayed for not having updated homelessness documentation. Providers have up to 45 days after the referral is accepted to update homelessness documentation.