

# ACTIVITIES, DEFINITION AND RECORDKEEPING FOR AT-RISK OF HOMELESSNESS

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Slide 8 updated from original presentation.

## QUESTIONS

- Enter questions into Question panel of GoToWebinar
  - Questions will be addressed at the end of each section
- If have questions after the webinar, email [esg@tdhca.state.tx.us](mailto:esg@tdhca.state.tx.us)

## OVERVIEW

- For Emergency Solutions Grants (ESG) Program:
  - Eligible activities for persons At-Risk of Homelessness
  - Recordkeeping requirements for the definition of At-Risk of Homelessness

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## AT-RISK OF HOMELESSNESS CATEGORIES

Three categories for at-risk of homelessness:

1. Individuals and Families
2. Unaccompanied Children and Youth
3. Families with Children and Youth

- At-Risk of Homelessness Definition Handout:  
<https://www.hudexchange.info/resource/1975/criteria-for-definition-of-at-risk-of-homelessness/>
- At-Risk of Homelessness Recordkeeping Handout:  
<http://www.tdhca.state.tx.us/home-division/esgp/docs/RecordkeepingAtRiskHomelessDef.pdf>

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## PROGRAM PARTICIPANT SERVICES FOR ESG

Four Program Participant Services for ESG:

1. Street Outreach
2. Emergency Shelter
3. Rapid Re-housing
4. Homelessness Prevention

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## SERVICES DETAILS

- ESG Basics:
- <https://www.tdhca.state.tx.us/home-division/esgp/video-library.htm>

### ESG Webinar Training Video Archive

Windows Media Player is required.

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▶ Income Eligibility Training

▼ ESG Webinars

ESG webinars are topic-specific technical assistance and guidance for ESG Subrecipients. The webinars are often presented by Texas Department of Housing and Community Affairs' staff, and can also feature guest speakers, and peer-to-peer learning. Interested parties may sign up for notices regarding ESG webinars and other ESG-related notices online via [TDHCA's email list](#). For specific questions regarding ESG, please email [esg@tdhca.state.tx.us](mailto:esg@tdhca.state.tx.us).

Archived ESG Webinars	
<a href="#">Calculating Assets</a> – February 3, 2016 <a href="#">Calculating Assets (PDF)</a>	00:51:59
<a href="#">Community Services Block Grant</a> – May 2, 2018 <a href="#">Community Services Block Grant (PDF)</a>	00:21:03
<a href="#">Coordinated Access and Fair Housing</a> – January 6, 2016 <a href="#">Coordinated Access and Fair Housing (PDF)</a>	00:51:00
<a href="#">Domestic Violence and Homelessness</a> – December 7, 2016 <a href="#">Domestic Violence and Homelessness (PDF)</a>	00:55:29
<a href="#">ESG and HOME TBRA Rent Reasonableness</a> – September 12, 2018 <a href="#">ESG and HOME TBRA Rent Reasonableness with webinar question responses (PDF)</a>	00:41:12
<a href="#">ESG and Services or Institutions</a> – September 7, 2016 <a href="#">ESG and Services or Institutions (PDF)</a>	01:02:32
<a href="#">ESG Basics</a> – May 22, 2019 <a href="#">ESG Basics Handout (PDF)</a>	00:43:50

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# HOMELESSNESS PREVENTION

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## HOMELESSNESS PREVENTION

- Homeless Definitions that qualify for Homeless Prevention (recap)
  - Homeless Category 2(i)-(iii), Imminent Risk of Homelessness
    - If under 30% Area Median Family Income, and recertify every 3 months\*
  - Homeless Category 3(i)-(iv), Homeless Under Other Statutes
    - If under 30% Area Median Family Income, and recertify every 3 months\*
  - Homeless Category 4(i)-(iii), Fleeing Domestic Violence
    - If under 30% Area Median Family Income, and recertify every 3 months\*

\*updated from the original presentation.

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## HOMELESSNESS PREVENTION

- At-Risk of Homelessness
  - At-Risk Category 1(i)-(iii), Individuals and Families
    - If under 30% Area Median Family Income and recertified every 3 months
  - At-Risk Category 2, Unaccompanied Children and Youth
    - If under 30% Area Median Family Income and recertified every 3 months
  - At-Risk Category 3, Families with Children and Youth
    - If under 30% Area Median Family Income and recertified every 3 months

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## HOMELESSNESS PREVENTION AT-RISK CATEGORY 1(i) AND (ii)

- At-Risk Category 1
  - (i) Income below 30% AMFI; AND
  - (ii) No sufficient resources or support networks; AND
  - (iii) One of the criteria listed on the next two slides.

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HOMELESSNESS PREVENTION  
AT-RISK CATEGORY 1(iii)

- (A) Has moved two or more times during 60 days for economic reasons; or
- (B) Doubled up for economic hardship; or
- (C) Notified in writing that they will lose housing in 21 days; or
- (D) Lives in motel/hotel paid by client; or
- (E) Lives in overcrowded\* unit; or...

\*Overcrowded unit is more than 2 people per single-room occupancy/efficiency apartment, or for larger units more than 1.5 persons per room (not per bedroom). Unit should also meet state and local occupancy guidelines.

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HOMELESSNESS PREVENTION  
AT-RISK CATEGORY 1(iii) (con't)

- (F) Exiting a publicly-funded institution or system of care\*; or
- (G) Lives in housing that is associated with instability as identified in TDHCA's consolidated plan\*\*.

\*A publicly funded institution includes as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution.

\*\*2019 One Year Action Plan identified transitional housing as having characteristics associated with instability.

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## QUIZ 1

Karla and Al's landlord wants to renovate to raise the rent. Karla and Al received a notice to vacate in 30 days. They have less than 30% AMFI and no other resources or supports. Nine days after the notice to vacate, ESG can assist with homelessness prevention.

- A. True
- B. False

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## QUIZ 1 ANSWER

Karla and Al's landlord wants to renovate to raise the rent. Karla and Al received a notice to vacate in 30 days. They have less than 30% AMFI and no other resources or supports. Nine days after the notice to vacate, ESG can assist with homelessness prevention.

- A. True

Even though their notice states 30 days, Karla and Al have 21 days to vacate because they waited to apply for assistance.

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## QUIZ 2

Ysidra and Alan have been living in a motel for 25 days. They apply for ESG assistance. They have income below 30% AMFI, no other resources or supports, and can qualify for assistance with which of the following evidence:

- A. They are paying for the motel themselves
- B. A church cannot pay for the motel for longer than 14 days after the application date
- C. Either A or B

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## QUIZ 2 ANSWER

Ysidra and Alan have been living in a motel for 25 days. They apply for ESG assistance. They have income below 30% AMFI, no other resources or supports, and can qualify for assistance with which of the following evidence:

- A. They are paying for the motel themselves
- B. A church cannot pay for the motel for longer than 14 days after the application date
- C. Either A or B

Ysidra and Alan don't need both A and B, but either will qualify them. "A" qualifies them as At-Risk of Homelessness Category 1 and "B" qualifies them as Homeless Category 2.

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### QUIZ 3

Mary, Tom, Alison, and Bill live in a two bedroom apartment. This apartment also has a kitchen and a living room. This apartment is overcrowded, at more than 1.5 persons per room. True or False?

- A. True
- B. False

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### QUIZ 3 ANSWER

Mary, Tom, Alison, and Bill live in a two bedroom apartment. This apartment also has a kitchen and a living room. This apartment is overcrowded, at more than 1.5 persons per room. True or False?

- B. False

Even though there are more than 1.5 persons per bedroom, there are still less than 1.5 persons per room.

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## QUIZ 4

Emily is exiting a health care facility where she has stayed for 57 days and has no where to go. She was staying with her son, but his family just had a baby and they cannot take her back. She has income below 30% AMFI. She qualifies for:

- A. Emergency Shelter
- B. Rapid Re-housing
- C. Homelessness Prevention
- D. Both Emergency Shelter and Homelessness Prevention

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## QUIZ 4 ANSWER

Emily is exiting a health care facility where she has stayed for 57 days and has no where to go. She was staying with her son, but his family just had a baby and they cannot take her back. She has income below 30% AMFI. She qualifies for:

- D. Both Emergency Shelter and Homelessness Prevention

Emily wasn't homeless before entering the health care facility, so she does not qualify under Homeless Category 1(iii) for Rapid Re-Housing. She qualifies for Emergency Shelter and Homelessness Prevention under Homeless Category 2. Exiting a health care facility could qualify her for Homelessness Prevention under At-Risk Category 1.

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HOMELESSNESS PREVENTION  
AT-RISK CATEGORY 1(iii)(F) YOUTH EXITING FOSTER CARE

- Youth exiting foster care may be at-risk of homelessness if, they
  - have annual income below 30 percent of the median family income for the area, as determined by HUD;
  - do not have sufficient resources or support networks to prevent him or her from moving to an emergency shelter or other place not intended as a regular sleeping accommodation for human beings; and
  - are exiting a publicly funded institution, or system of care (such as a mental health facility).
- Similar to At-Risk Category 1(i), 1(ii), and (1)(iii)(F).

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HOMELESSNESS PREVENTION  
AT-RISK CATEGORY 2 AND 3

- Category 2
  - Child or youth who does not qualify as homeless but qualifies under another federal statute.
- Category 3
  - Youth or family with children who qualifies under McKinney-Vento Homeless Assistance Act

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## HOMELESSNESS PREVENTION RECORDKEEPING

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### AT-RISK 1 – INDIVIDUAL/FAMILIES RECORD KEEPING GUIDELINES

- Source documents of housing situation (best); or
- Written statement by third party or written certification of the oral statement of third party by intake staff (second best); or
- Visit by intake staff of client's residence or documentation why visit was not possible (third best).

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AT-RISK 1(i) AND (ii)  
INDIVIDUAL/FAMILIES

- At-Risk Category 1
  - (i) Income below 30% AMFI; and
  - (ii) No sufficient resources or support networks; and
  - (iii) Meet one criteria on a list.

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AT-RISK 1(i) AND (ii) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

- At-Risk Category 1
  - (i) Income below 30% AMFI;
    - Income eligibility forms and supporting documentation; and
  - (ii) No sufficient resources or support networks
    - Clients certification on form that:
      - Insufficient financial resources and support networks; and
      - Source documents to support certification; or
      - Written statement from third party; or
      - Due diligence to obtain source documents; and
  - (iii) Meet one criteria on a list.

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AT-RISK CATEGORY 1(iii)  
INDIVIDUAL/FAMILIES

- (A) Has moved two or more times during 60 days for economic reasons; or
- (B) Doubled up for economic hardship; or
- (C) Notified in writing that they will lose housing in 21 days; or
- (D) Lives in motel/hotel paid by client; or
- (E) Lives in overcrowded unit; or
- (F) Exiting a publically-funded institution or system of care; or
- (G) Lives in housing that is associated with instability as identified in TDHCA's consolidated plan.

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QUIZ 5

To receive Homelessness Prevention, a client needs to self-certify that he/she does not have resources or supports to prevent homelessness, and this statement must be supported by source documentation. True or false?

- A. True
- B. False

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## QUIZ 5 ANSWER

To receive Homelessness Prevention, a client needs to self-certify that he/she does not have resources or supports to prevent homelessness, and this statement must be supported by source documentation. True or false?

B. False

The intake worker must do his/her due diligence to support the self-certification, and document the due diligence if supporting documentation is not found.

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## AT-RISK 1(iii)(A) – INDIVIDUAL/FAMILIES RECORD KEEPING

(A) Has moved two or more times during 60 days for economic reasons;

- At Risk Category (1)i and (1)ii documentation; and
- Housing history:
  - HMIS records; or
  - Referral from housing/service provider; or
  - Letter from tenant/owner; and
  - \*\*Intake observation is not appropriate\*\*
- Economic reasons:
  - Notice of termination; or
  - Overdue bills or bills with arrears.
  - \*\*Intake observation is not appropriate\*\*

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## QUIZ 6

Eric cannot pay his rent and has an notice to vacate. He has HMIS records showing he stayed at a shelter two times last month before getting his apartment. He certifies that he has no resources or supports. When calculating his income, the intake staff gets his paystubs and bank statements showing his income is below 30% AMFI. Does Eric also need to provide documentation of his past due bills as lack of resources?

- A. Yes
- B. No

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## QUIZ 6 ANSWER

Eric cannot pay his rent and has an notice to vacate. He has HMIS records showing he stayed at a shelter two times last month before getting his apartment. He certifies that he has no resources or supports. When calculating his income, the intake staff gets his paystubs and bank statements showing his income is below 30% AMFI. Does Eric also need to provide documentation of his past due bills as lack of resources?

- B. No

Income certification should gather enough information that past due bills are not required.

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AT-RISK 1(iii)(B) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(B) Doubled up for economic hardship

- At Risk Category (1)i and (1)ii documentation; and
  - Housing status:
    - Letter from tenant/owner of being doubled up; or
    - Intake observation by Intake Staff of doubled up; and
  - Economic Reasons:
    - Notice of termination; or
    - Overdue bills or bills with arrears.
    - \*\*Intake observation is not appropriate\*\*

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QUIZ 7

Peter loses his job and moves in with Paul. Peter is sleeping on the couch and can only stay with Paul 14 days before Peter has to be put on the lease. Peter can get a letter from Paul that Peter moved in because of economic reasons, which will document the file for Homelessness Prevention. True or False?

- A. True
- B. False

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QUIZ 7  
ANSWER

Peter loses his job and moves in with Paul. Peter is sleeping on the couch and can only stay with Paul 14 days before Peter has to be put on the lease. Peter can get a letter from Paul that Peter moved in because of economic reasons, which will document the file for Homelessness Prevention. True or False?

A. True

A letter from Paul is enough to verify housing status. A letter from the landlord is not required.

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AT-RISK 1(iii)(C) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(C) Notified in writing that they will lose housing in 21 days;

- At Risk Category (1)i and (1)ii documentation; and
- Housing status:
  - notice to vacate to leave in 21 days or less; or
  - Court order to leave in 21 days or less; or
  - Eviction letter from tenant/homeowner if doubled up.
  - \*\*Intake observation is not appropriate\*\*

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## QUIZ 8

Cassandra is 8 months into a 12 month lease. She receives a 3 day notice to vacate. She must also get a court order to vacate in order to receive Homelessness Prevention.

- A. True
- B. False

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## QUIZ 8 ANSWER

Cassandra is 8 months into a 12 month lease. She receives a 3 day notice to vacate. She must also get a court order to vacate in order to receive Homelessness Prevention.

- B. False

Cassandra is in the lease, so must get an notice to vacate OR court order for At-Risk Category. If she was trying to meet Homeless Category 2, she would need a court order.

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AT-RISK 1(iii)(D) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(D) Lives in motel/hotel paid by client;

- At Risk Category (1)i and (1)ii documentation; and
- Housing Status:
  - Letter from hotel/motel manager; or
  - Intake observation; and
- Economic status:
  - Cancelled checks, credit card statements made to hotel/motel; or
  - A letter from the hotel/motel stating individual was covering the cost.
  - \*\*Intake observation not appropriate\*\*

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## QUIZ 9

Mark is has been staying at a hotel for five nights, has run out of funds, and has nowhere else to go. His income is below 30% AMFI and he lacks resources and supports. The intake staff can certify that he/she observed that Mark is living in a hotel by:

- A. Writing a statement that the intake staff visited the hotel and talked to the manager
- B. Writing a statement that Mark provided hotel receipts for the last five days
- C. Either A or B

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QUIZ 9  
ANSWER

Mark is has been staying at a hotel for five nights, has run out of funds, and has nowhere else to go. His income is below 30% AMFI and he lacks resources and supports. The intake staff can certify that he/she observed that Mark is living in a hotel by:

- A. Writing a statement that the intake staff visited the hotel and talked to the manager
- B. Writing a statement that Mark provided hotel receipts for the last five days
- C. Either A or B

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AT-RISK 1(iii)(E) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(E) Lives in overcrowded unit

- At Risk Cat. (1)i and (1)ii documentation; and
- Housing status -- Document number of rooms and individuals in unit by:
  - Lease or rental agreement or
  - Intake observation.

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AT-RISK 1(iii)(E) – INDIVIDUAL/FAMILIES  
EXAMPLE

- Sondra lives in an apartment with her husband Kyle, and children, Chris, Steve and Julie. The apartment has a kitchen, living room, and one bedroom, which counts as three rooms.
  - Take the five people in the apartment and divide by 3 room, to equal 1.6 persons per room.
  - There is more than 1.5 persons per room. This unit is overcrowded.

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AT-RISK 1(iii)(F) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(F) Exiting a publically-funded institution or system of care

- At Risk Category(1)i and (1)ii documentation; and
- Housing status:
  - Discharge paperwork; or
  - Referral letters; or
  - Due diligence of attempts to receive paperwork.

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## QUIZ 10

Calvin is released from the hospital where he had a pneumonia. He wasn't able to work and now is facing eviction. His income is below 30% AMFI and he has no other resources or supports.

The intake worker still needs:

- A. To contact the hospital to get discharge paperwork.
- B. A doctor's diagnosis showing Calvin's medical condition and stating he can't work.
- C. Both A and B.

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## QUIZ 10 ANSWER

Calvin is released from the hospital where he had a pneumonia. He wasn't able to work and now is facing eviction. His income is below 30% AMFI and he has no other resources or supports.

The intake worker still needs:

- A. To contact the hospital to get discharge paperwork.

Do not ask for medical information with discharge paperwork.

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AT-RISK 1(iii)(G) – INDIVIDUAL/FAMILIES  
RECORD KEEPING

(G) Lives in housing that is associated with instability as identified in TDHCA's consolidated plan.

- Transitional housing.
- At Risk Category(1)i and (1)ii documentation; and
  - Housing status:
    - Discharge paperwork; or
    - Referral letters; or
    - Due diligence of attempts to receive paperwork.

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AT-RISK CATEGORY 2  
UNACCOMPANIED CHILDREN & YOUTH

At-Risk Category 2

- Child or youth who does not qualify as homeless but qualifies under another federal statute
- Housing status:
  - Income under 30% AMFI; and
  - Certification by local entity administering other homeless programs (section 387(3) of the Runaway and Homeless Youth Act, the Head Start Act, Violence Against Women Act, Public Health Service Act , Food and Nutrition Act of 2008, or the Child Nutrition Act of 1966)
  - Third Party written only.

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## AT-RISK 2– UNACCOMPANIED CHILDREN & YOUTH RECORD KEEPING - EXAMPLE

Nicole is a youth classified as homeless under the Violence Against Women Act. Her income is below 30% AMFI. With the referral letter from her social worker, she can be helped by Homelessness Prevention.

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## AT-RISK CATEGORY 3 FAMILIES WITH CHILDREN AND YOUTH

### At-Risk Category 3

- Youth or family with children who qualify under McKinney-Vento Homeless Assistance Act
- Housing status:
  - Income under 30% AMFI; and
  - Certification by local entity administering McKinney Vento; and
  - Confirmation that family/guardian is residing with children/youth (if adults are with the children).
  - Third Party written only.

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## AT-RISK 3– FAMILIES WITH CHILDREN AND YOUTH RECORD KEEPING - EXAMPLE

Robin’s two children qualify as homeless under the McKinney Vento Act. Robin and her children are staying with a friend because they can’t afford their own apartment. She comes with a letter certifying from her children’s school stating that her children qualify as homeless, and that Robin’s children live with Robin. The family’s income is below 30% AMFI. She qualifies for homelessness prevention.

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CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families  Qualifies for Homelessness Prevention (>30% AMFI)	An individual or family who:  (i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u>  (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u>  (iii) Meets one of the following conditions:  (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u>  (B) Is living in the home of another because of economic hardship; <u>OR</u>  (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u>  (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u>  (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u>  (F) Is exiting a publicly funded institution or system of care; <u>OR</u>  (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan	
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute. <u>Qualifies for Homelessness Prevention</u> (>30% AMFI)	
	Category 3	Families with Children and Youth  Qualifies for Homelessness Prevention (>30% AMFI)	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.	

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## COMMON CONFUSIONS

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### COMMON CONFUSIONS VACATE – HOTEL/MOTEL

- Two mentions of hotel/motel
  - Homeless Category 1, Literally Homeless
    - An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals).
  - At-risk Homeless Category 1, Families and Children
    - At-Risk "Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State or local government programs for low-income individuals.

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## COMMON CONFUSIONS VACATE TIME PERIODS

- Notice to vacate
  - Homeless Category 2, Imminent Risk
    - “The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance”
  - At-risk Category 1, Individuals and Families
    - “Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance”

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## COMMON CONFUSIONS INSTITUTION

- Institutions
  - Homeless Category 1, Literally Homeless
    - “An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution”
  - At-risk Category 1, Individuals and Families
    - “Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution)”

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## COMMON CONFUSIONS YOUTH

- Homeless Category 3, Homeless under Other Federal Statutes
  - “Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who...”
- At-risk Category 2 and 3, Unaccompanied Children and Youth
  - “A child or youth who does not qualify as ‘homeless’ under this section, but qualifies as ‘homeless’ under” other federal statutes
  - “A child or youth who does not qualify as homeless this section, but qualifies as ‘homeless’ under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 USC 11434(a)(2), and the parent(s) or guardian(s) or that child or youth if living with him or her.”

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# THANK YOU

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Questions?

EMAIL US AT: [ESG@TDHCA.STATE.TX.US](mailto:ESG@TDHCA.STATE.TX.US)



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BREAK