

# THE HFA INSTITUTE 2025

## HOME-ARP Session 2

Documenting HOME-ARP Qualified Populations



**MRBs and  
Other Federal  
Homeownership  
Programs**  
JANUARY 15 – 17



**Housing Credit**  
JANUARY 14 – 16



**Section 8 and  
Other Federally  
Assisted  
Multifamily  
Housing**  
JANUARY 15 – 17



**HOME and  
Housing Trust  
Fund**  
JANUARY 12 – 14



## Speakers

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# Agenda

Review of Qualifying Populations

General QP Recordkeeping: Preferred Order

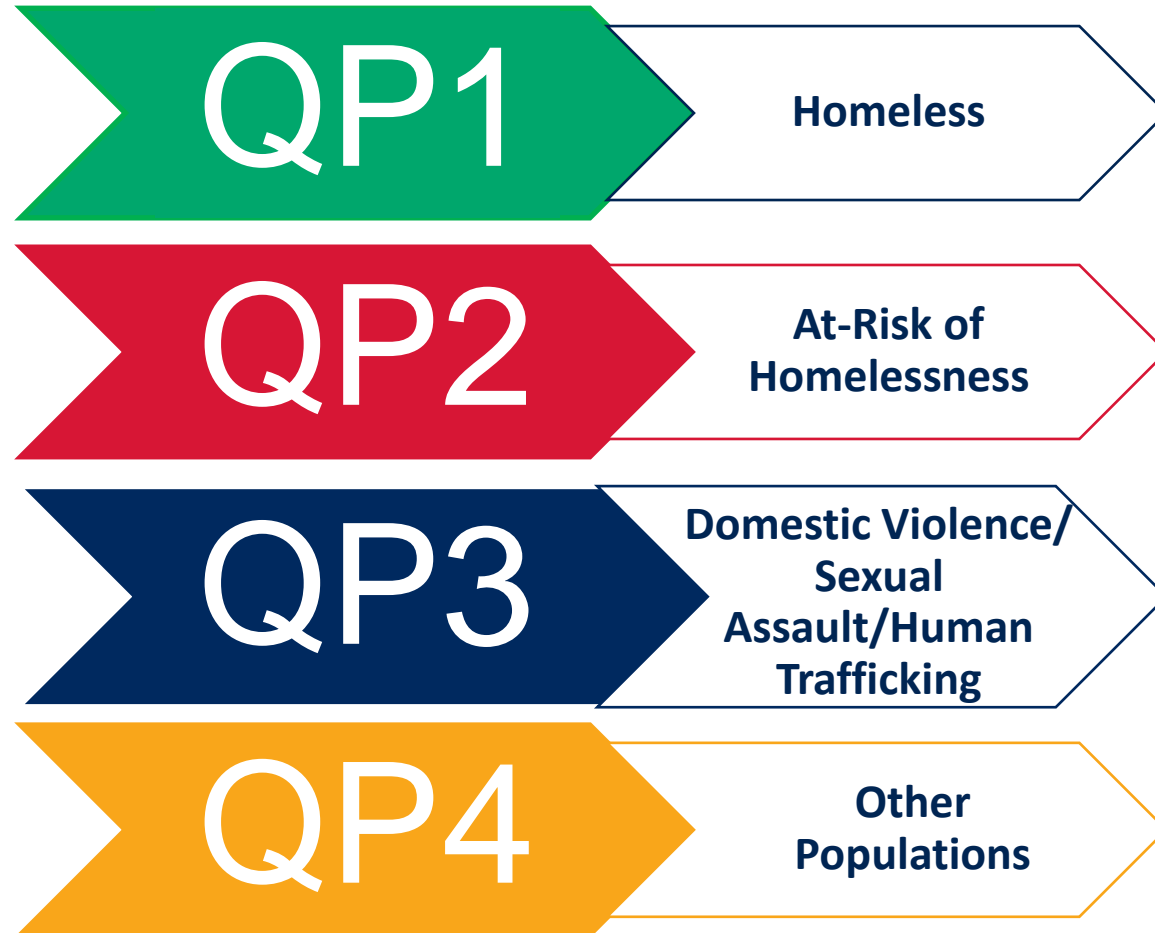
Documentation for each Qualifying Population

- Key Components of QP Definitions
- Documentation
- Case Scenarios

Summary

Frequently Asked Questions

# Qualifying Populations (QPs)



- QP definitions are specific to HOME-ARP.
- QP definitions primarily focuses on living situations.
- Income limitations are not part of every QP definition.

# General QP Recordkeeping: Preferred Order

This preferred order of documentation **MUST** be followed for QP1, QP2, and QP4.  
This preferred order of documentation **DOES NOT** apply to QP3.

## First Tier: Third Party Verification

Written and source documentation, and database records (like HMIS)



## Second Tier: Intake Worker Observation

Written, signed and dated observation of staff completing intake.



## Third Tier: Self-Certification

Written, signed and dated self-certification by the individual or head of household seeking assistance

## First Tier Documentation: Third Party Verification

### Source Documents

- Pre-existing records from a third party provided to intake staff such as receipts and printouts from relevant third-party information systems
- **Example:** SSI award letter, Eviction Notice, Discharge paperwork

### Written Verification

- Letters, written referrals, or written observations by another person that are signed, dated, and on appropriate letterhead.
- **Example:** Written observation of a shopkeeper, written referral from law enforcement, letter from property owner that person must leave

### Documented Oral Verification

- Verification provided by a third party given over the phone or in person directly to intake staff. Intake staff records the statement in writing, certifies its true and completes, signs and dates.
- **Example:** Intake worker calls leaseholder who confirms that family can no longer stay in her apartment after this week due to a pending lease violation.

## Second Tier Documentation: Intake Worker Observation



### Intake Worker observation must:

- Be issued on third party letterhead or from an agency email address
- Identify the intake worker that made the observation
- Certify that the statement is true and complete
- Be signed and dated by the intake worker

**Example:** An intake worker physically observes a person residing in their car and writes, signs and dates the observation for the record.

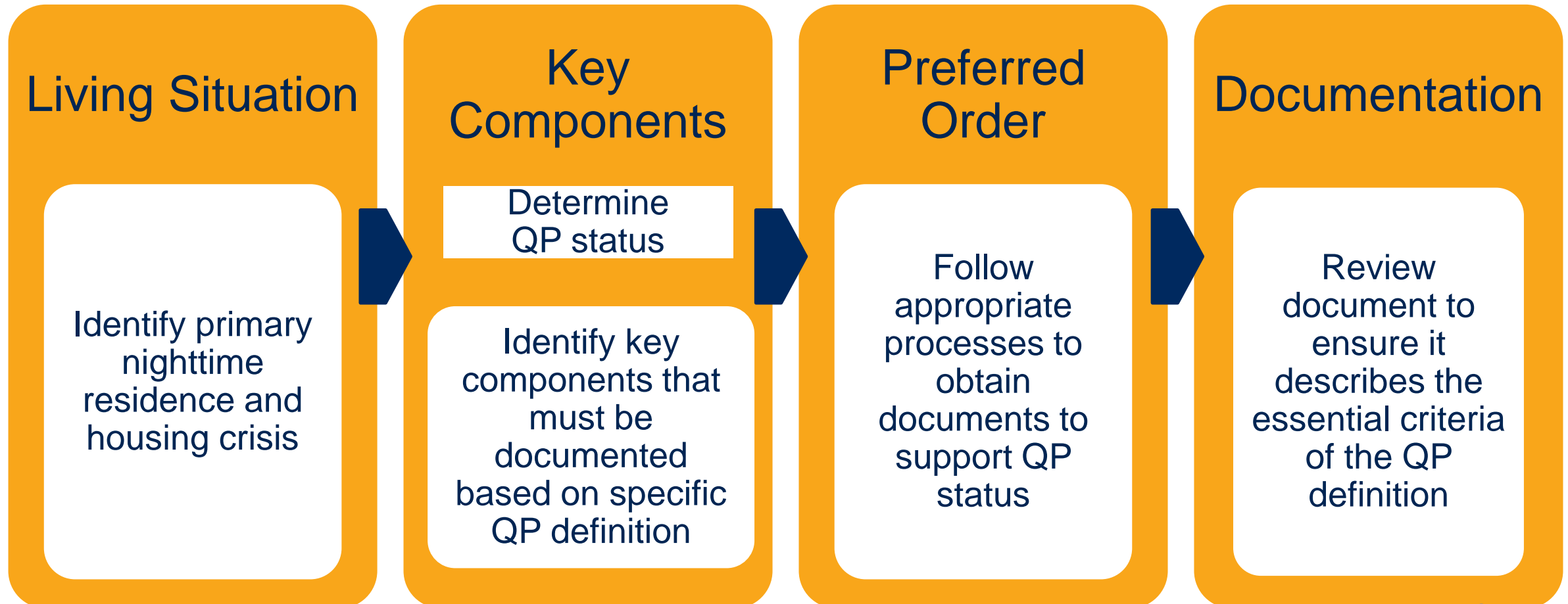
## Third Tier Documentation: Self-Certification



### **Self-Certification must:**

- Identify the individual or head of household
- Provide detail of specific criteria being documented
- Certify that the statement is true and complete
- Be signed and dated by the individual or head of household

# Determining Documentation Needed



# Qualifying Population 1:

Homeless

# Key Components: QP1 Paragraph 1

 No Income Requirement


## Literally Homeless

- **Living situation**
  - Place not meant for human habitation
  - Emergency Shelter
  - Hotel/Motel paid for by charitable or governmental organization
  - Institution for less than 90 days (homeless immediately prior)

## Key Components: QP1 Paragraph 2

### Imminent Risk of Homelessness

- **Timeline** (14 days from losing residence), and
- **Lack of resources and support to obtain other housing, and**
- **No other residence identified**

 **No Income Requirement**

# Key Components: QP1 Paragraph 3

 No Income Requirement

## Homeless Under Other Federal Statutes

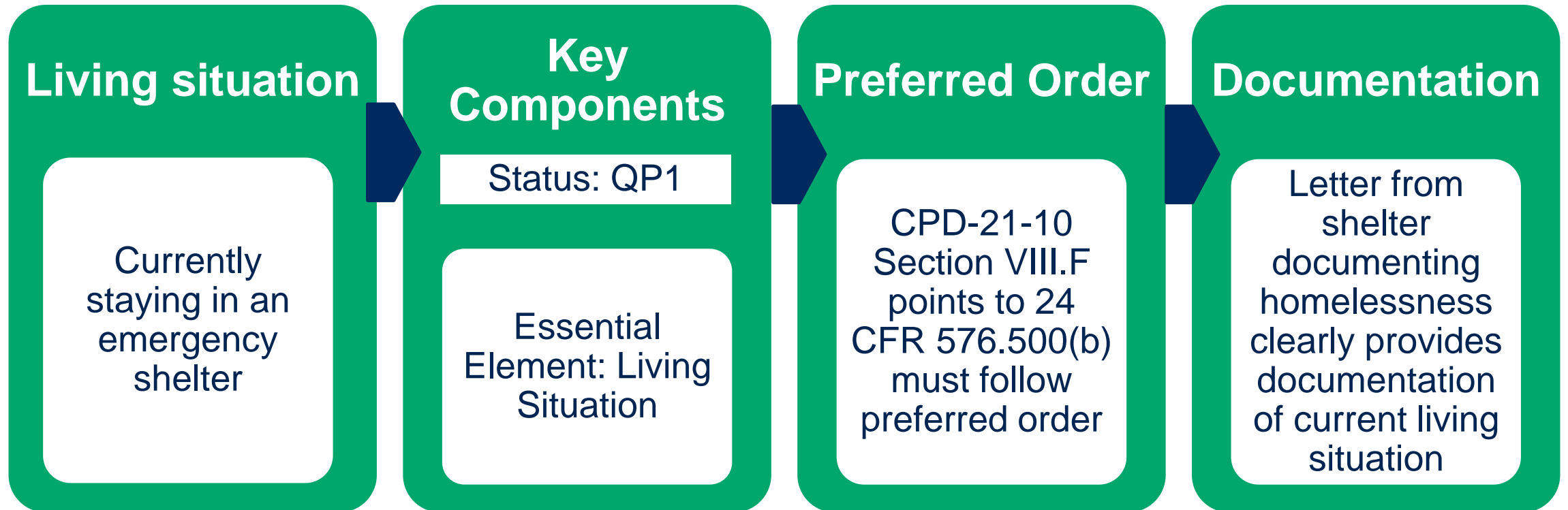
- **Meets definition of homeless in other federal statutes**
- **History of living situation:** No permanent housing in the last 60 days AND moving two or more times, AND
- **Barriers:** Presence of special needs or 2 or more barriers.

## QP1: Case Scenario

A participant states that he is **homeless** because he was **residing in a tent in a local park but now in an emergency shelter**. You request documentation to verify the participant's current living situation from HMIS and the local shelters. The client has an HMIS entry indicating the client is staying in an emergency shelter program for the past week. The shelter provides a letter that indicates the client is residing at their shelter.



# QP1 - Case Scenario: Documentation



# Qualifying Population 2:

At Risk of Homelessness

# Key Components: QP2 Paragraph 1

## At risk of Homelessness - Paragraph 1

- **Income**
  - Less than 30% AMI, and
- **Lack of resources and support, and**
- **Evidence of housing instability (A-G)**



**Income  
Requirement**

## Key Components: QP2 Paragraph 2 & 3

### At risk of Homelessness - Child and Youth

- **A child or youth who meets definition of homeless under other federal statutes**
- **Includes parents or guardians living with a child or youth who qualify under paragraph 3**



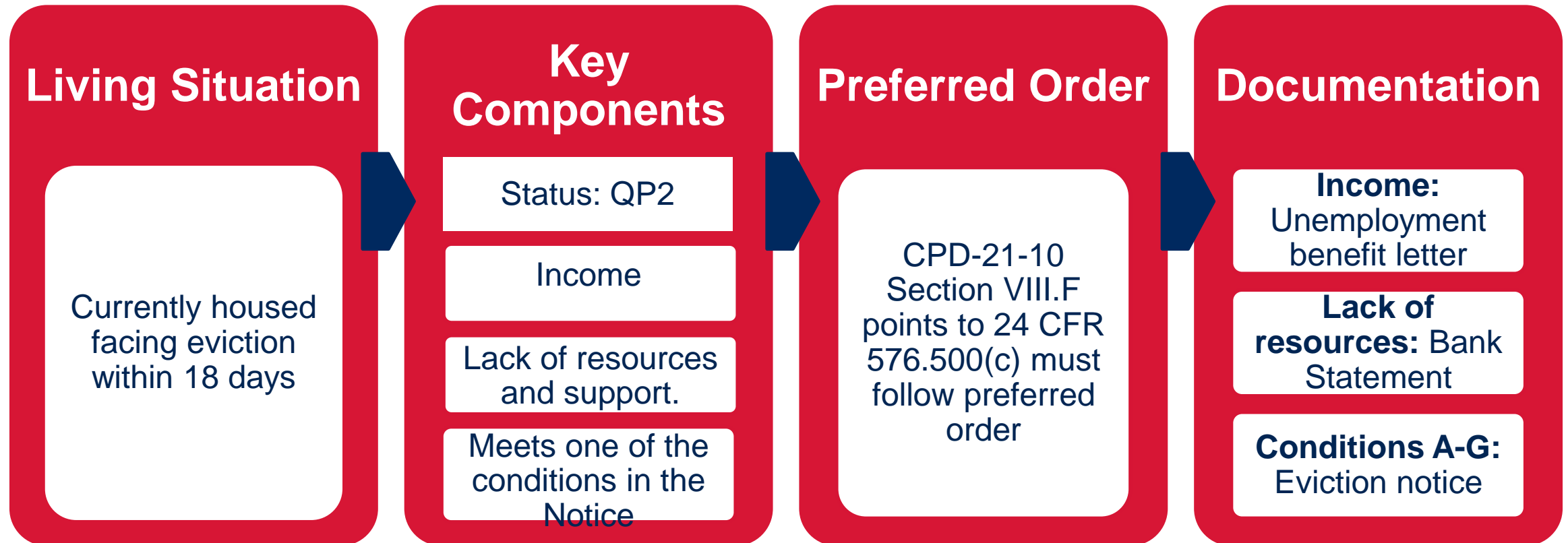
**No Income  
Requirement**

## QP2 - Case Scenario

A HOME-ARP applicant is **being evicted** from their apartment **in 18 days**. The applicant states they lost their job and are **receiving unemployment benefits**. The applicant states they have **no other immediately available resources**.



# QP2 -Case Scenario Documentation



# Qualifying Population 3:

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

## Key Components: QP3

### Fleeing, or attempting to flee

- domestic violence
- dating violence
- sexual assault
- stalking
- human trafficking (labor or sex trafficking)

 No Income Requirement

## Key Components: QP3

### QP 3

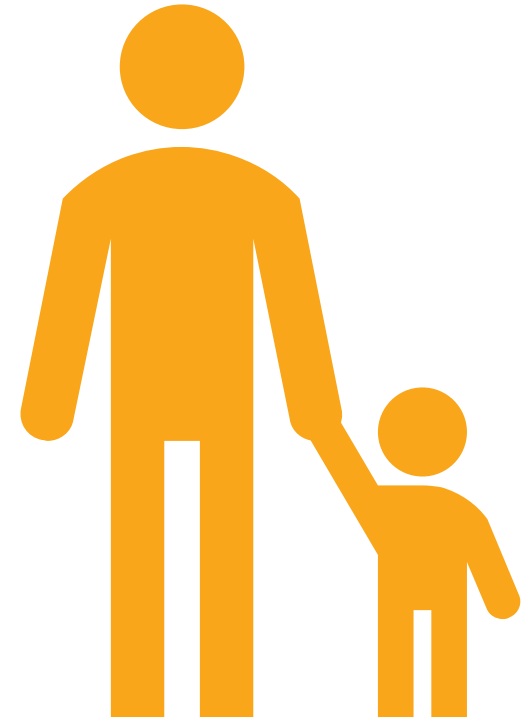
- **Threat of harm based on current living situation.**
- **There are no income or homeless status requirements.**



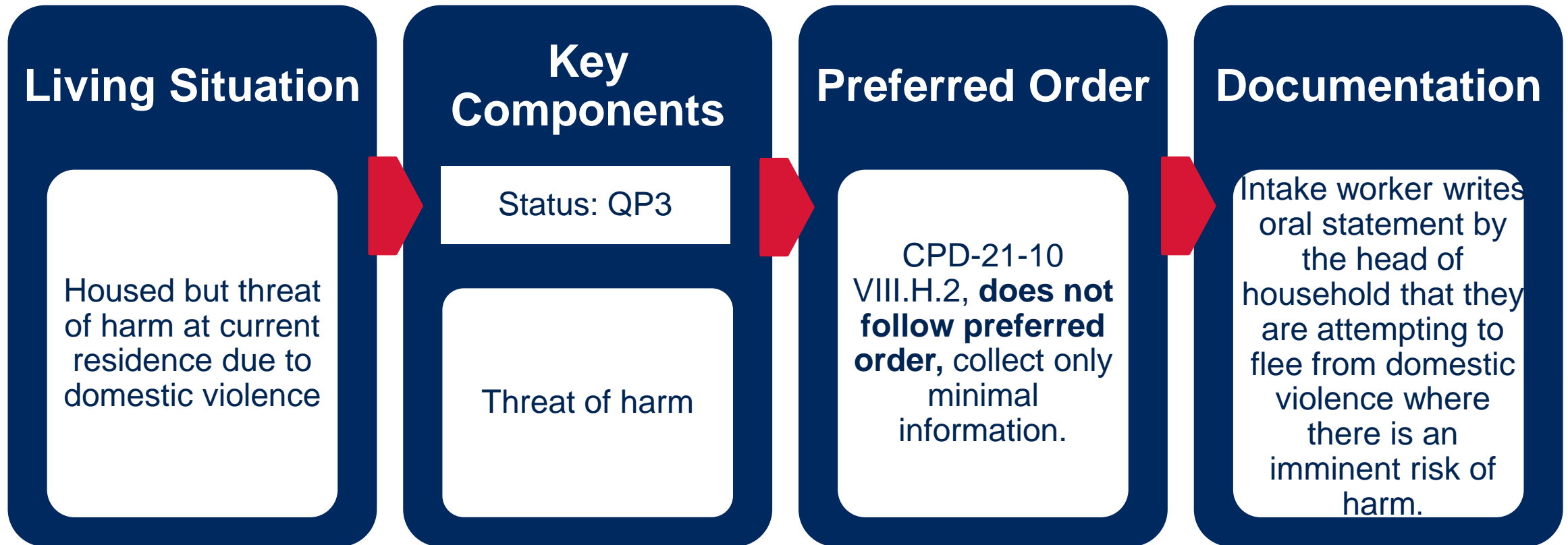
**No Income Requirement**

## QP3 - Case Scenario

A HOME-ARP applicant states that he and his daughter are at **imminent risk of harm due to a domestic violence** situation at their apartment.



## QP3 - Case Scenario



# Qualifying Population 4:

Other Populations

# Key Components: QP4 Paragraph 1

## Requires Assistance to Prevent Homelessness

- Previous **homeless history**
- Currently housed in **temporary or emergency assistance** program that is ending
- Additional **assistance needed to prevent** return to homelessness

 **No Income Requirement**

# Key Components: QP4 Paragraph 2i and 2ii

## At Greatest Risk of Housing Instability - 2.i

- **Income**
  - 30% AMI and below
- **Cost burden**
  - Paying more than 50% annual income towards housing costs



**Income Requirement**

## At Greatest Risk of Housing Instability - 2.ii

- **Income**
  - 50% AMI and below
- **Housing Instability**
  - Meets condition A-G from at risk of homelessness



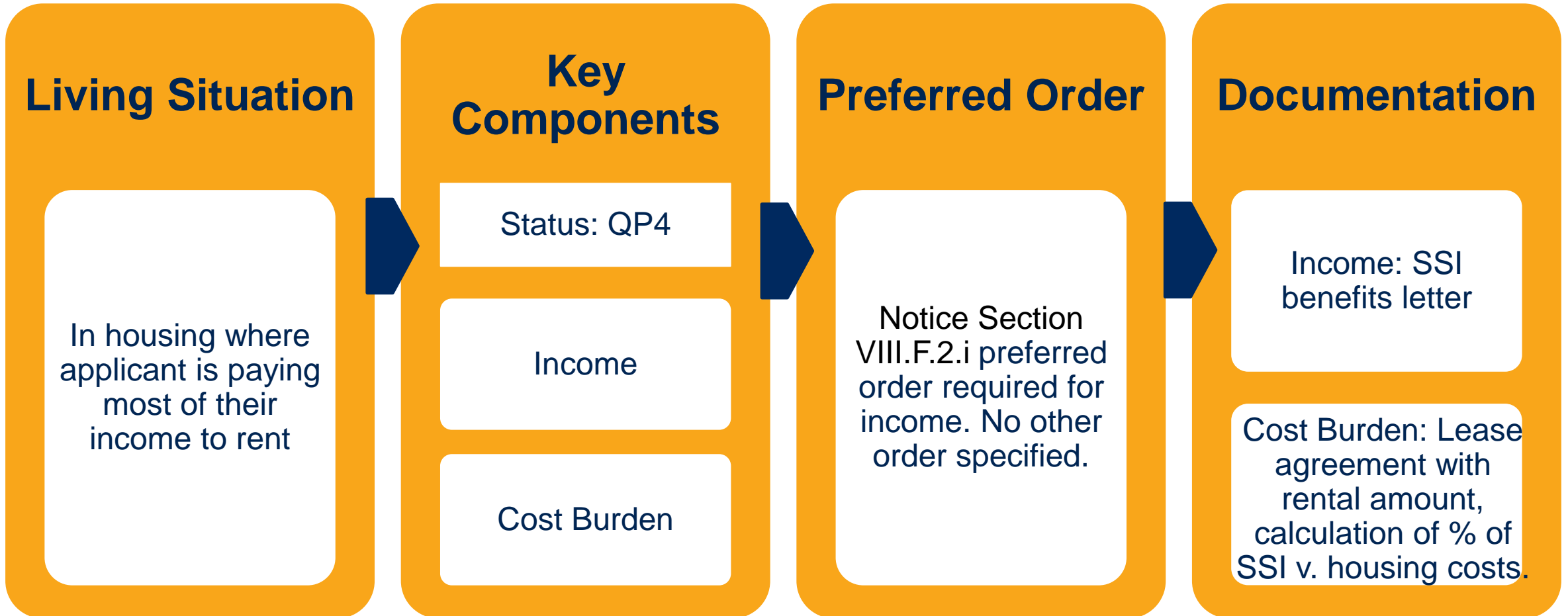
**Income Requirement**

## QP4 - Case Scenario

A HOME-ARP applicant on SSI is falling behind in their rent. Rental unit costs \$500 a month which is nearly 70% of their monthly income.



## QP4 - Case Scenario



# Recordkeeping for Preferences and Methods of Prioritization (MoP)

# Steps for Documenting Preferences and MoP

## Identify

Clearly identify preference and method of prioritization, if applicable.

For subpopulation preferences, clearly define who is included in the subpopulation.

## Key Components

Identify the key pieces of the QP definition where documentation efforts should be focused.

## Documentation

Determine what types of documents support the key elements of the preference definition and, if any preferred order will be required for obtaining documents.

# Preference Example: QP1 Veteran

After ensuring the household met the QP1 definition. What documentation would be needed for veteran status?

Define “Veteran”

- What Discharge status will be accepted?
- How many days minimum in Active Duty?
- What about Reservist and National Guard?

Documentation Options:

- DD-214 (Certificate of Release/Discharge from Active Duty) or Veteran ID
- Print out of veteran service record
- Confirmation of veteran status in SQUARES (VA web application to verify veteran status)
- Letter from VA or other veteran services provider

**PJ should include definitions and acceptable documentation in:**

- 1. written agreements**
- 2. tenant & client selection plans**
- 3. policies and procedures.**

## MoP Example: Length of Time Homeless

After ensuring the household met the preference, what documentation is needed for the method of prioritization of length of homelessness?

Define “length of homelessness”.

- How is length of time measured? Months?
- Does it include all months in someone’s life, last 3 years, or current episode?

Documentation Options:

- Partner with homeless services providers as much as possible
- Follow: third party verification, intake worker observation and self-certification
- Consider the use of self-certification, how long of a period can someone self-certify

**PJ should include definitions and acceptable documentation in:**

- 1. written agreements**
- 2. tenant & client selection plans**
- 3. policies and procedures.**

# Summary & Takeaways

## Collect only minimal information for QP3

- The written documentation need only include the minimum amount of information indicating that the individual or family meets QP3 definition and need not include any additional details about the conditions that prompted that individual or family to seek assistance.
- Limit the inclusion of identifying information, such as names, in data entry and shared documents until necessary (i.e. signing a lease)

## Stay Low Barrier

- Resist the urge to put burden on participants to prove eligibility in situations where it is impossible to obtain third-party verification. Please note, this practice should be used sparingly.
- Partner and use systems that are the repository of reliable documentation to assist in eligibility determinations, after the PJ has ensured that such systems and information quality are acceptable.

# Summary & Takeaways cont

## Create Templates

- Look to current forms and procedures as templates and tailor to both activities, and preferences/limitations
- Provide subrecipient/owner templates to assist in QP eligibility
- Ensure that definition differences between HOME-ARP and other programs are clear.

## PJ Oversight

- Clearly articulate in HOME-ARP written agreements the QPs to be assisted, including preferences/limitations, documentation standards
- Train in assessing and documenting eligibility
- Regularly review eligibility determinations to ensure correct determination of eligibility and implementation of preferences/limitations

# HOME-ARP Resources on the HUD Exchange

To assist with the recordkeeping requirements for QP status the following tools have been released:




## At-A-Glance QP definitions

- Intended for PJ and partner staff who need to know the full QP definitions
- Takes the technical QP definitions and formats them for easy at-a-glance readability



## QP Documentation Requirements

- Looks at the Key Components of each QP definition that must be documented
- Provides examples documentation for each component of the QP definition



## Assisting HOME-ARP Qualifying Populations: Guidance for Elected Officials

- More graphic visualization of summarized QP definitions

# Frequently Asked Questions

Documenting QPs

## Question #1: Veteran Definition

**During our outreach process for the HOME-ARP allocation plan, we received a question from Veteran’s Affairs asking what definition of “Veteran” is used under the HOME-ARP program.**

- The HOME-ARP Notice **does not define** the term “veteran.” However, it is essential to note that HOME-ARP funds must benefit individuals and families within specified qualifying populations. Any individual or family meeting the criteria for these populations is deemed eligible to receive assistance or services funded through HOME-ARP without the requirement of additional criteria.

## Question #2: At Risk of Homelessness

**Many of our tenants receive a 30-day Pay or Quit notice that indicates that the tenant has violated the lease agreement. In most cases, the eviction process goes through many phases before the tenant is legally required to move. Can we accept the 30-day Pay or Quit as documentation for Condition (C) “been notified in writing that your right to occupy your current housing or living situation will be terminated within 21 days after the date of application for assistance”?**

- If the 30 day pay or quit notice is not notification that the household is required to vacate the unit within 21 days, then the pay or quit notice does not meet criteria for Criteria (C).

## Question 3: Income Determinations

**How does a Rental Housing project determine tenant contribution to rent if they are not collecting income documentation and only QP status?**

- If a household meets a QP definition that does not include income criteria, the PJ is not required to perform an initial income determination of household income **except as necessary to determine an affordable rental contribution by the qualifying household** or to establish eligibility for another funding source in the unit that imposes income restrictions (Section VI.B.1)