

Subject: Question Response for CoC Question ID 168792 - HUD Exchange Ask A Question

Date: Sunday, January 3, 2021 at 6:38:55 PM Eastern Standard Time

From: aaq@hudexchange.info

To: lpareti housinginnovations.us

Question Status: Answered

Thank you for submitting a question via the HUD Exchange. The response to your question is listed below.

Requestor Name: Lauren Pareti

Requestor Email: lpareti@housinginnovations.us

Question Related To: Continuum of Care Program

Question ID: 168792

Question Subject:

Dedicated Plus and disability

Question Text:

If someone is residing in an Emergency Shelter, Safe Haven or unsheltered location and had been admitted and enrolled in a RRH project within last year, but was unable to maintain the RRH placement, to qualify as DedicatedPLUS, must they have documentation of disability dating back to their entry into RRH?

Typically, it is not known upon RRH entry that the person will later need another intervention, and so, no disability documentation is obtained at that point. Assuming the person met the homelessness criteria for chronic at the point of RRH entry, would it suffice to obtain the disability documentation at the point that the person is being certified as meeting DedicatedPLUS criteria and prior to entry into a DedicatedPLUS PSH project?

The same issue comes up when seeking a transfer for someone currently residing in RRH for whom it is determined that PSH is necessary to maintain housing stability. Assuming the person met the homelessness criteria for chronic at the point of RRH entry, would it suffice to obtain the disability documentation at the point that the person is being certified as meeting DedicatedPLUS criteria and prior to entry into a DedicatedPLUS PSH project?

Response:

Thank you for your question.

HUD would like to clarify that intake workers of the PSH project are held responsible for documenting the individual or head of household's eligibility at PSH intake since that is a requirement to be served in the project. In the scenario in which a person is currently residing in RRH, the individual or head of household must have met the eligibility criteria for the dedicated or DedicatedPLUS PSH project at intake* into the RRH project, however it is not required that this be verified at intake into RRH.

Instead, what this means is the required length of time homeless (i.e., 12 months of residing in a place not

meant for human habitation, in a safe haven, or in an emergency shelter) must have occurred **by the time the person was housed in the RRH unit**, looking back one year or three years from the date of the RRH move-in date, depending on whether the homeless occasions were continuous or cumulative. The recipient of RRH could use the time the individual is being assisted in their program to collect the documentation of homelessness history that will be required for PSH if they believe a transfer to PSH may be necessary.

In regards to documentation for disability, this can be obtained *after* the individual or head of household is already enrolled in the RRH project since it is assumed that the disability already existed prior to the individual presenting for assistance based on the nature of the disability being "long-continuing or of indefinite duration."

Keep in mind, once a person resides in a RRH unit, the housing itself is still considered **permanent housing** so the time spent residing in a RRH unit would **not** count towards the length of time that is required to reside on the streets, shelter, or safe haven in order to be considered eligible for DedicatedPLUS. Rather, the time spent in RRH would count as a *break* in homelessness if the stay in RRH is for at least seven nights. For more information on how HUD defines a break in homelessness please refer to FAQ 2752: [What constitutes an occasion of homelessness and how does HUD define a break.](#)

Additional Documentation Considerations for DedicatedPLUS PSH:

Recipients of CoC Program funding for permanent supportive housing (PSH) designated as DedicatedPLUS are required to document eligibility of all program participants served at the time of program enrollment. HUD requires that for all program participants assisted in a DedicatedPLUS project, recipients obtain the following documentation:

- Evidence that the head of household has a qualifying disability as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)).
- Evidence that the program participant is currently residing in a location that makes them eligible.
- History of homelessness that demonstrates that the household meets any of the DedicatedPLUS eligibility criteria.

Recipients of DedicatedPLUS projects are not required to follow the recordkeeping requirements included in the final rule on Defining "Chronically Homeless" except in those cases where the recipient has opted to designate a portion of units within the DedicatedPLUS project; for those beds only, the recordkeeping requirements in the final rule apply. For DedicatedPLUS generally, HUD expects recipients and subrecipients to obtain as much third-party evidence as possible when documenting length of time homeless for program participants and encourages CoCs to adopt local standards for DedicatedPLUS projects that establish local policies and procedures, including what is considered due diligence for gathering third-party documentation.

More specific guidance for documenting eligibility in DedicatedPLUS PSH can be located [here](#).

As a reminder, **all housing referrals** for CoC and ESG-funded projects must go through the CoC's coordinated entry process as required in HUD's [Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System](#) and based on the policies documented in the CoC's coordinated entry policies and procedures.

Please note: the response provided in this email is specific to the question you submitted and may not apply to similar questions. Therefore, please use discretion in providing the response to others, as the answer may not apply to their particular situations.

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