

**Subject:** Question Response for CoC Question ID 168538 - HUD Exchange Ask A Question

**Date:** Wednesday, January 6, 2021 at 10:08:25 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:** 168538

**Question Subject:**

Dedicated Plus - req to serve families

**Question Text:**

To qualify under the section of the DedicatedPLUS definition copied below, must an individual or family have been BOTH admitted to AND enrolled in a PSH or RRH project within the last year? Could someone enrolled in RRH/PSH in the last year but admitted to PSH/RRH more than 12 months ago qualify as DedicatedPLUS?

For example would someone who was:

- chronic upon PSH entry in October 2019; and
- evicted and exited from PSH in November 2020; and
- living in shelter in December 2020

be qualified as DedicatedPLUS?

Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a

permanent housing project within the last year and were unable to maintain a housing placement;

**Response:**

Thank you for your question.

A DedicatedPLUS project is a permanent supportive housing (PH-PSH) project where the entire project will serve individuals and families where the head of household has a disability and who meet any of the following criteria at project entry (*in any order*):

1. Experiencing chronic homelessness as defined in 24 CFR 578.31;\*
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been **admitted and enrolled** in a permanent housing project **within the last year** and were unable to maintain a housing placement;
4. Residing in transitional housing funded by a Joint transitional housing (TH) and rapid re-housing (PHRRH) component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
5. **Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions;** or
6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Please note that the third eligible category refers to persons who were admitted for entry, enrolled in the permanent housing project, **and** exited that project -- all within the previous twelve months from the date of intake into the DedicatedPLUS project. While that does not appear to be the case for this individual, please keep in mind it's possible they could meet the fifth eligible category (#5 in the list), depending on the head of household's homeless history within the last three years and whether they were homeless on less than four separate occasions (*Eligible category #5: Residing and has resided in a place not meant for human habitation, Safe Haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions*).

Also, HUD would like to clarify that the six eligible categories described above for DedicatedPLUS have no particular order by which recipients and subrecipients should be determining eligibility for households. For additional guidance on DedicatedPLUS PSH, please review HUD's resource-- *DedicatedPLUS PSH Eligibility, Recordkeeping Requirements, and Documentation Standards (published December 2020)*: <https://www.hudexchange.info/resource/6219/dedicatedplus-eligibility-recordkeeping-requirements-and-documentation-standards/>

*\*Please note that DedicatedPLUS projects may still choose to dedicate some of their beds to individuals or families experiencing chronic homelessness, and in these cases HUD will expect that those beds serve individuals and families meeting HUD's definition of chronic homelessness and be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area.*

#### **Additional guidance on documenting eligibility 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.

Keep in mind the following applies if you are looking to document DedicatedPLUS PSH eligibility under the *fifth* eligible criteria: *Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions.*

Current Living Situation:

- HMIS (or other database) record of stays in an emergency shelter or outreach contacts; or,
- Written verification from third-party source: service provider, healthcare professional, law enforcement officer of one or more encounter ; a community member; or an outreach worker or intake worker observation; or,
- Written verification completed by person seeking assistance

Prior History of Homelessness:

- HMIS (or other database) record of stays in an emergency shelter or outreach contacts; or,
- Written verification from third-party source: service provider, healthcare professional, law enforcement officer of one or more encounter; a community member; or an outreach worker or intake worker observation; or,
- Written verification completed by person seeking assistance

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.

**Please click on the [View Question] button below to perform the following actions:**

- **View your question**, answer, and any applicable attachments
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