

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

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Question Related To: Continuum of Care Program

Question ID: 102022

Question Subject:

Chronic Eligibility Change

Question Text:

Is the change in 12 months over 3 years, instead of 4 separate occasions only applicable to Dedicated PLUS PSH?

Response:

Thank you for your question.

As found in the [NOFA](#), through the [FY 2017 CoC Program Competition](#) CoCs may create new permanent supportive housing projects that meet the requirements of **DedicatedPLUS** as defined in Section III.A.3.d. of this NOFA or new permanent supportive housing projects where 100 percent of the beds are dedicated to chronic homelessness. We have outlined the differences between **DedicatedPLUS** and **beds dedicated to chronic homelessness** at the end of the response.

To be clear, the definition of chronically homeless remains the same. The [Final Rule on Defining “Chronically Homeless”](#) states that to be considered chronically homeless an individual or head of household must be considered a “homeless individual with a disability”, currently be living in a place not meant for human habitation, in a safe haven, or in an emergency shelter, and must have been residing in one of those locations either **continuously for the last 12 months, or over a period of at least four occasions, that cumulatively total 12 months, over the last three years.**

If you are referring to a homeless individual that 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, he or she would not be considered chronically homeless at that point in time. However, they would be eligible for projects designated as DedicatedPLUS through the FY 2017 CoC Program Competition. Please note that in the FY 2017 CoC Program Competition, HUD created the DedicatedPLUS concept to provide more flexibility to communities to expand their

eligibility to serve persons with long histories of homelessness and severe service needs who would not meet the definition of chronic homelessness at project entry.

Key differences between DedicatedPLUS and beds dedicated to chronic homelessness:

PSH beds dedicated to chronically homeless individuals and families:

Beds that are dedicated to chronically homeless individuals and families are those beds dedicated specifically for use by chronically homeless individuals and families within a CoC's geographic area, as reported in the CoC's HIC and the FY 2016 permanent housing project applications. When a program participant exits the project, **the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC's geographic area. This concept only applies to permanent supportive housing (PSH) projects.** If a project is made up of 100 percent dedicated beds, this is what HUD commonly refers to as a project that is 100 percent dedicated for chronically homeless individuals and families.

PSH beds that are DedicatedPLUS:

The DedicatedPLUS concept applies at the project level. All new PSH projects are required to either be (1) 100 percent dedicated to chronic homelessness or (2) DedicatedPLUS. Renewal PSH projects may choose to change their classification to DedicatedPLUS as part of their project application.

DedicatedPLUS projects may serve individuals and families with disabilities and families that meet the following criteria at project entry:

1. experiencing chronic homelessness as defined in 24 CFR 578.3;
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 TH and PH-RRH 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.

DedicatedPLUS projects may still choose to dedicate some of their beds to those 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. For example, if a new PSH project applies for 100 beds and chooses to dedicate 50 of those beds to individuals and families experiencing chronic homelessness, then HUD will expect that at any given time 50 of the beds be filled by someone who met HUD's definition of chronic homelessness at project entry. The remaining 50 beds may be used to serve individuals and families meeting the criteria described above.

Finally, keep in mind that if a recipient decides to change the number of beds that are dedicated to persons experiencing chronic homelessness in a renewal PSH project and it is awarded, this change would become effective on the operating start date of the FY 2017 renewal grant and is not retroactive to the current operating year.

For more information, view the [Defining "Chronically Homeless" Final Rule](#) and [accompanying FAQs about recordkeeping requirements](#). You may also access a recording of a [webinar and supporting materials](#) related to the definition of chronically homeless for more detailed information. HUD recently released tools to assist recipients and subrecipients on the definition of chronically homeless:

- [Flowchart of HUD's Definition of Chronic Homelessness](#) – A flow chart that guides you through HUD's Chronically Homeless Definition through mostly "Yes" or "No" questions, providing an interactive way to help understand who meets the definition and what documentation requirements apply
- [Sample Chronic Homelessness Documentation Checklist](#) – A sample checklist that provides an optional way to help record Chronic Homelessness for those projects that need documentation of Chronic Homelessness.

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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