

Special Attention of: All CPD Directors HUD Field Offices HUD Regional Offices All ESG Formula Recipients All Continuums of Care Notice: CPD-18-080

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**Expires:** This notice is effective until amended, superseded, or rescinded.

Cross Reference: 24 CFR Part 578, 42 U.S.C. 11371, et seq.

Subject: Notice for Housing Inventory Count (HIC) and Point-in-Time (PIT) Data Collection for Continuum of Care (CoC) Program and the Emergency Solutions Grants (ESG) Program

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## **1. PURPOSE OF THIS NOTICE**

This Notice supersedes CPD 17-08 (Notice for Housing Inventory Count (HIC) and Point-in-Time (PIT) Data Collection for Continuum of Care (CoC) Program and the Emergency Solutions Grants (ESG) Program) published in 2017. Similar to the prior Notice, this Notice informs Continuums of Care (CoCs) of the information that must be collected to successfully complete the Housing Inventory Count (HIC) and Point-in-Time (PIT) count for 2019 and future counts this Notice applies to. This Notice is being published under the authority of 24 CFR 578.7(c)(2)(iii) and creates additional requirements for the PIT counts. The Notice also provides further guidance on how to complete the HIC. The HIC and PIT data play a critical role in the CoC Program Competition and HUD will continue to emphasize through its scoring the significance of the data reported as well as the process for the data collection. However, HUD deems most important the quality and accuracy of the count as opposed to merely the size of the count. As CoCs begin to organize and plan these activities, CoC staff should review this Notice and use it as a reference to ensure that CoCs are capturing all of the information HUD requires.

Under section 578.7 of the CoC Program interim rule, CoCs must plan and conduct, at least biennially, a PIT count of homeless persons within the geographic area. Section 578.3 of the CoC Program interim rule states that PIT counts are "carried out on one night in the last 10 calendar days of January or at such other time as required by HUD." HUD has historically, through Notices of Funding Availability, required CoCs to conduct an annual HIC and PIT count to receive maximum points in the annual CoC Program Competition and anticipates continuing this practice for the indefinite future. The HIC and PIT count data will continue to provide critical updates on national and local progress towards preventing and ending homelessness.

To accommodate the goals and constraints of the HIC and PIT counts, this notice uses simplified definitions of certain complicated or nuanced terms, such as "rapid re-housing" and "chronically homeless." These definitions are meant only for use in conducting the HIC and PIT counts. For the definitions that apply to HUD's program requirements, refer to HUD's program regulations.

CoCs will submit their HIC and PIT count data via HUD's <u>Homelessness Data Exchange</u> (HDX) in the spring following the count as part of the CoC Program Competition for the year of the count. Additional guidance on the submission process will be released at a future date.

If you have questions about entering HIC or PIT count data that are not covered in this Notice, please submit them via the <u>Ask a Question</u> page on the <u>HUD Exchange</u>. To submit a question, select **HDX (PIT, HIC, AHAR, Sys PM, PDX)** under Reporting Systems.

### 2.1 HIC Changes

- A. In the FY2017 CoC Program Competition, HUD began funding joint component grants that combine the activities of transitional housing (TH) with rapid re-housing (RRH) projects. CoCs should report these grants on the HIC by entering two separate projects one for TH and one for RRH. Inventory reported under each project should reflect the inventory in use on the night of the count. To indicate that these are joint TH/RRH grants, CoCs must select **both** the HUD: CoC Transitional Housing and HUD: CoC Rapid Re-Housing funding source options in response to the **HUD McKinney-Vento Funded** question for each project. Reporting these as separate projects helps distinguish inventory for people currently experiencing homelessness from inventory for people formerly experiencing homelessness, per HUD's definition.
- B. Under the **Inventory Type** section of the HIC, HUD no longer distinguishes new inventory from current inventory. CoCs now report their data as either current (i.e., all inventory that is in operation on the night of the CoC's PIT count) or under development (i.e., all inventory that is projected, but not in operation during the PIT count).
- C. CoCs will report their HMIS participation based on the entire project. Either the project completely participates in HMIS or it does not. If part of a project's inventory participates in HMIS and another part does not, it should be split into two projects, one representing the inventory participating in HMIS and one representing the inventory not participating in HMIS.
- D. HUD is requiring CoCs to include the HMIS Project ID to all projects on the HIC. Currently, HMIS Project ID is only required for CoCs that upload the HIC.
- E. CoCs will no longer report their VA-funded Compensated Work Therapy, Transitional Residence (CWT/TR) grants in the HIC. With this exclusion, persons in CWT/TR projects will also be excluded from the sheltered PIT count.
- F. CoCs will no longer report on Target Population A to HUD. HUD is renaming what was "Target Population B" as "Target Population" beginning in 2019.
- G. HUD is clarifying that the **Housing Type** designation should apply to the entire project. The rationale for collecting this information for all residential projects is to understand the type of building or buildings that house clients and understand whether the geography for the mailing address for that location is actually reflective of the location of some or all of the clients housed by the project. A project must be completely "site based/single site," "site based/clustered site," or "tenant-based/scattered site." If part of a project's inventory is site based in a single location and other part is tenant-based vouchers, it should be split into two projects, one representing the "site based/single site" inventory and the other representing the "tenant based/scattered site" inventory. For emergency shelter, the Housing Type selected should be consistent with the **Bed Type**.

Housing Type	Description	Appropriate Bed Type (for ES only)
Site-based/ single site	All clients are housed in a single project facility.	Facility-based beds

Housing Type	Description	Appropriate Bed Type (for ES only)
Site-based/ clustered- multiple sites	All clients are housed in more than one project facility, but more than one client is housed in each project facility. The facility locations are owned, operated, or sponsored by the project. This can include PBRA and may include SBRA, if multiple clients are housed in several separate sponsored facility locations.	Facility-based beds
Tenant- based/ scattered site	Clients have leases or other occupancy agreements and are housed in market-rate, scattered-site residences. This includes TBRA and may include SBRA, if clients are housed in sponsored units where each unit has a distinct mailing address.	Voucher-based beds

- H. Sponsor-based Rental Assistance (SBRA) can operate like Tenant Based Rental Assistance (TBRA) or Project-based Rental Assistance (PBRA), which has caused some confusion about whether these projects are required to add an address. HUD is clarifying that an address is required for all projects that function like either of the two "site-based" housing types listed in item G above.
- I. While Victim Service Providers (VSP) are exempted from providing address information, HUD encourages providers to enter a zip code associated with the project.

#### 2.2 PIT Changes

None.

# **3. HOUSING INVENTORY COUNT GUIDANCE**

This section provides guidance for collecting data required for the HIC. The HIC is a point-intime inventory of projects within your CoC that provide beds and units dedicated to serving persons who are homeless. It is intended to provide HUD and CoCs with information about the shelter and housing capacity of homeless crisis response systems. It should reflect the number of beds and units available on the night designated for the count that are *dedicated to serve persons who are homeless (and, for permanent housing projects, persons who were homeless at entry), per the* <u>HUD homeless definition</u>.

CoCs are required to submit their HIC data through the <u>HUD HDX website</u>. Additionally, CoCs must provide HIC data to the entity responsible for the Consolidated Plan jurisdiction(s) located within the CoC, when requested. This includes providing HIC data at the geocode level for each jurisdiction required to report PIT count data in the Consolidated Plan. A CoC could cover one or more Consolidated Plan jurisdictions. In turn, HUD expects states and entitlement communities responsible for completing Consolidated Plans to participate in the HIC by contributing project-level information to CoC and HMIS leads to facilitate the completion of the HIC.

## **3.1 Types of Homeless Projects to Include in the HIC**

Beds and units included on the HIC are considered part of the CoC homeless assistance system. *Beds and units in the HIC must be dedicated to serving homeless persons, or for permanent housing projects, dedicated for persons who were homeless at entry.* For the purposes of the HIC, a project with dedicated beds/units is one where:

- A. The primary intent of the project is to serve homeless persons;
- B. The project verifies homeless status as part of its eligibility determination; and
- C. The actual project clients are predominantly homeless (or, for permanent housing, were homeless at entry).

Beds in institutional settings not specifically dedicated for persons who are homeless such as detox facilities, emergency rooms, jails, and acute crisis or treatment centers should not be included in the HIC. HUD considers extreme weather shelters as dedicated homeless inventory and they should be included in the HIC.

While there might be occasional instances where a project with dedicated beds serves a non-homeless person, beds in these types of projects could still be counted as dedicated beds. For example, a provider of a project that is intended to serve persons who are both homeless and intoxicated might be unable to determine homeless status at entry due to a person's severe intoxication. After admission, the provider determines some participants are not homeless and helps them return to their housing. In this instance, the project bed could still be counted as a dedicated bed for homeless persons.

For the HIC, CoCs will collect information about the beds and units in the CoC's homeless system, categorized by the Project Types described below. CoCs are required to include in the HIC **all** projects in the CoC that are categorized as one of these Project Types and that provide dedicated beds for persons who are homeless, not just those contributing client-level data in the local HMIS or receiving HUD funding. This includes projects funded by the other federal

agencies (e.g., VA, HHS), faith-based organizations, and other public and private funding sources.

The Project Types included in the HIC, as identified in the 2017 HMIS Data Standards are:

- A. Emergency Shelter (ES)
- B. Transitional Housing (TH)
- C. Safe Haven (SH)
- D. Permanent Housing (PH)
- 1) Permanent Supportive Housing (PSH)
- 2) Rapid Re-housing (RRH)
- 3) Other PH (OPH) combines two project types from the 2017 HMIS Data Standards:
  - PH Housing with Services (no disability required for entry); and
  - PH Housing Only

For the purpose of the HIC, permanent housing inventory is divided into three groups: permanent supportive housing (PSH), rapid re-housing (RRH), and other permanent housing (OPH).

- 1) To be considered PSH, the project must provide long-term housing to homeless individuals with disabilities and families in which one member of the household has a disability, and supportive services that are designed to meet the needs of the program participants must be available to the household.
- 2) To be considered a RRH bed and unit, the project must provide short-term or medium-term assistance (up to 24 months), the lease for units must be between the landlord and the program participant, the program participant must be able to select the unit they lease, and the provider cannot impose a restriction on how long the person may lease the unit, though the provider can impose a maximum length of time that grant funds will be used to assist the program participant in the unit.
- 3) To be considered OPH, the provider must provide long-term housing that is not otherwise considered permanent supportive housing or rapid re-housing. HUD's HMIS Data Standards defines two project types that represent the other permanent housing inventory PH: Housing with Services and PH: Housing Only. PH: Housing with Services projects provide long-term housing and supportive services for homeless persons, but do not limit eligibility to persons with a disability. PH: Housing Only projects provide long-term housing for homeless persons, but do not make supportive services available as part of the project. It is critical to note that the CoC should look at the entire service package of these permanent housing projects, as opposed to what is funded by certain funding streams. CoCs should remember that these OPH beds should only be reported if they are dedicated to homeless persons, as outlined in the first paragraph of this section.

In the FY2017 CoC Program Competition, HUD began funding joint component TH and RRH projects. CoCs should report these grants on the HIC by entering two separate projects – one for TH and one for RRH. **Inventory reported under each project should comport with the inventory instruction for its respective project type as described throughout this Notice.** For

the TH project, this would mean including the available TH beds in the HIC, even if the TH beds are empty on the night of the PIT count, just as you would for any other TH project. If the TH project does not have a fixed inventory and has no beds on the night of the count, the CoC should exclude the TH project from the HIC. For **both** projects of a joint component grant, select **both** the HUD: CoC – Transitional Housing and HUD: CoC – Rapid Re-Housing funding source options, regardless of the project type.

For a detailed list of which projects to include in the HIC, please see <u>Appendix A</u>.

## 3.1.1 VA Programs

The Department of Veterans Affairs (VA) recently designated components within its Grant and Per Diem (GPD) program and updated the component types for its GPD program. Communities should continue to report GPD programs in the HIC. The following chart outlines what project types are associated with each GPD program component.

Component in GPD	Project Type in the HIC
Bridge Housing	Transitional Housing
Low Demand	Safe Haven
Service Intensive Transitional Housing	Transitional Housing
Hospital to Housing	Transitional Housing
Clinical Treatment	Transitional Housing
Transition in Place	Permanent Housing - OPH

## 3.1.2 RHY Programs

It is important that CoCs coordinate with and include projects that provide shelter and housing to homeless children and youth in the HIC. Coordination will lead to a more accurate understanding of the inventory available to serve homeless children and youth in the CoC and will, hopefully, lead to improved service delivery. Specifically, CoCs should be sure to coordinate with local projects funded through the U.S. Department of Health and Human Services (HHS) Runaway and Homeless Youth (RHY) Program when planning and conducting their HIC. RHY projects provide homeless youth with short-term shelter, longerterm transitional living programs and maternity group homes, and also support youth through street outreach efforts. By engaging RHY programs in the HIC, CoCs will be able to collect more complete data on the emergency shelter and transitional housing programs that provide dedicated beds and units for homeless youth. However, CoCs should not include projects or beds/units in projects in the HIC that are dedicated for children who are in foster care, who are wards of the state, or who are otherwise under government custody or supervision. A list of current RHY grantees by city and state will be made available on the HUD Exchange. HUD also encourages CoCs to work with their Local Education Agencies (LEA) to participate in the count and assist CoCs to identify homeless children and youth in their geographic areas.

## **3.2 Using HMIS Data for the HIC**

HUD strongly encourages CoCs to use their HMIS data as a starting point to generate the HIC. CoCs must collect and enter project descriptor data for all CoC projects in the CoC's HMIS,

regardless of whether the CoC project participates in HMIS (i.e., makes a reasonable effort to record all universal data elements on all clients served in HMIS). Instructions for collecting and entering project descriptor data in the local HMIS can be found in HUD's <u>2017 HMIS Data</u> <u>Standards</u>. CoCs that rely on an HMIS that is strictly programmed according to the 2017 HMIS Data Standards must manually input the following additional information:

- A. Whether beds are associated with a presidentially-declared disaster
- B. Whether project funding sources include:
  - 1) Shelter plus Care (S+C)
  - Section 8 Moderate Rehabilitation Single-Room Occupancy program (SRO), including grants formerly funded under McKinney-Vento but renewed under Section 8
  - 3) Supportive Housing Program (SHP) funds

Projects that were originally funded under those programs but are currently being renewed under the CoC Program do not have to take this additional step.

Throughout this document, there are references to the HMIS project descriptor data element numbers found in the <u>2017 HMIS Data Standards</u>. These references are intended to assist CoCs that use their HMIS to complete their HIC to identify what HMIS data elements they can use as a starting point for their HIC. CoCs must still verify that the data generated from their HMIS for their HIC correspond with the requirements in this Notice. Prior to submitting HIC data in HDX, CoCs should coordinate with project staff to review, verify, and update, if necessary, the information collected about their project for the HIC.

#### **3.3 Completing the Bed Inventory**

The following sections identify the data necessary to complete the HIC, along with a brief description of each. If relevant, the data element number from the <u>2017 HMIS Data Standards</u> is included in brackets, e.g., Project Identifiers [2.2]. While not all of these data elements apply to every project, they are all needed in order to generate an accurate HIC.

#### 3.3.1 Organization and Project Information

In general, projects included in any HMIS-based reporting for HIC purposes should be limited to those projects that are identified in Data Element 2.4 Field 1 as "Continuum Projects" (i.e., considered part of the CoC homeless assistance system), as described in Section 3.1 of this Notice.

**Organization Identifiers [Data Element 2.1]:** The name of the organization providing shelter or housing to homeless persons.

**Project Identifiers [Data Element 2.2]:** A unique project name and ID for each distinct CoC project. Only projects that have beds available for occupancy or under development on the night of the count should be included on the HIC (see *Inventory Type*, below).

Status [Data Element 2.2, Fields 3 and 4]: Whether the project remains active or should be marked as closed for the current HIC.

Project Type [Data Element 2.4]: The relevant type of project (e.g., emergency shelter).

**Geocode [Data Element 2.8, Field 3]** Geocodes should also reflect the location of the project's principal site or, for multiple site projects, the location in which the majority of the project's clients are housed. A list of geocodes can be found at: https://www.hudexchange.info/resource/5307/fy-2017-coc-geographic-codes/.

**Target Population [Data Element 2.8, Field 4]:** The population served by project, if applicable. A population is considered a "target population" if the project is designed to serve that population and at least three-fourths (75 percent) of the clients served by the project fit the target group descriptor. A single project is prohibited from having more than one Target Population. Information about project targeting for veterans, youth, and persons experiencing chronic homelessness should be collected at the bed level, per Bed and Unit Inventory data elements below. Note that there might be some projects that serve a target population of survivors of domestic violence but do not qualify as a "victim service provider." For the purposes of the HIC, "Survivors of Domestic Violence" includes projects that serve people currently experiencing homelessness because they are fleeing domestic violence, dating violence, sexual assault, or stalking.

Abbreviation	Description
DV	People who are Survivors of Domestic Violence
HIV	Persons living with HIV/AIDS
NA	Not Applicable

**HUD McKinney-Vento Funded [Data Element 2.6]:** Whether the project receives any HUD McKinney-Vento funding. HUD McKinney-Vento programs that provide funding for lodging projects include the following [corresponding HMIS data element 2.6 response options relevant to lodging projects are listed under each]:

Program	Funding Sources [Data Element 2.6]
Emergency Solutions Grants Program (ESG)	HUD: ESG – Emergency Shelter
	HUD: ESG – Rapid Re-Housing
Continuum of Care Program (CoC)	HUD: CoC – Safe Haven
	HUD: CoC – Transitional Housing
	HUD: CoC – Permanent Supportive Housing
	HUD: CoC – Rapid Re-Housing
	HUD: CoC – Single Room Occupancy
Shelter Plus Care program (S+C)	n/a
Section 8 Moderate Rehabilitation Single- Room Occupancy program (SRO), including grants formerly funded under McKinney- Vento but renewed under Section 8	n/a
Supportive Housing Program (SHP)	n/a

**Note:** CoCs should only select S+C, SRO, or SHP as the McKinney-Vento funding source if they still have funding and use requirements associated with that funding. Projects that were originally funded under those programs but are currently being renewed under the CoC Program should only identify CoC as the funding source.

Additional Federal Funding Sources [Data Element 2.6]: HUD requires CoCs to report on additional federal funding sources in the HIC in the "Additional Federal Funding Sources" field. If there are multiple additional federal funding sources, CoCs will select all that apply for each project. If there are no additional federal funding sources, the CoC should not select any option. These funding sources are:

**Funding Sources [Data Element 2.6]** 

HUD: HUD/VA Supportive Housing (HUD/VASH)

VA: Supportive Services for Veteran Families Program (SSVF)

VA: Grant and Per Diem Program (GPD) – Bridge Housing

VA: Grant and Per Diem Program (GPD) – Low Demand

VA: Grant and Per Diem Program (GPD) – Hospital to Housing

VA: Grant and Per Diem Program (GPD) - Clinical Treatment

VA: Grant and Per Diem Program (GPD) – Service Intensive Transitional Housing

VA: Grant and Per Diem Program (GPD) – Transition in Place

VA: CRS Contract Residential Services

VA Community Contract Safe Haven Program (HCHV/SH)

HHS: RHY Basic Center Program (BCP)

HHS: RHY Transitional Living Program (TLP)

HHS: RHY Maternity Group Homes for Pregnant and Parenting Youth (MGH)

HHS: RHY Demonstration Project

HUD: Housing Opportunities for Persons With AIDS (HOPWA) shelter and housing programs. This includes the following HMIS data element 2.6 response options:

- HUD: HOPWA Hotel/Motel Vouchers
- HUD: HOPWA Permanent Housing Placement (facility based or TBRA)
- HUD: HOPWA Short-Term Supportive Facility
- HUD: HOPWA Transitional Housing (facility-based or TBRA)

HUD Public and Indian Housing (PIH) programs (non-VASH), including public housing and housing choice voucher inventory that is dedicated to homeless persons

#### Other

CoCs should identify each federal funding source that currently supports the project, even if a source only partially funds the beds and units.

**Note:** CoCs should not report VA-funded Mental Health Residential Rehabilitation Treatment Program – Domiciliary Care for Homeless Veterans (VADOM) and Compensated Work Therapy, Transitional Residence (CWT/TR) grants inventory in the HIC. The VA and HUD determined that VADOM and CWT/TR inventory are more appropriately identified as institutions and should not be included in the HIC or PIT count.

**Housing Type [Data Element 2.8, Field 8]:** CoCs indicate the "Housing Type" in the organization and project information section. All of the inventory for the project must fall within the selected Housing Type. If a project has multiple Housing Types, it must be split into separate projects. The Housing Type options are:

Housing Type	Description
1. Site-based/ single site	All clients are housed in a single project facility.
2. Site-based/ clustered- multiple sites	All clients are housed in more than one project facility, but more than one client is housed in each project facility. The facility locations are owned, operated, or sponsored by the project. This can include PBRA and may include SBRA, if multiple clients are housed in several separate sponsored facility locations.
3. Tenant- based/ scattered site	Clients have leases or other occupancy agreements and are housed in market-rate, scattered-site residences. This includes TBRA and may include SBRA, if clients are housed in sponsored units where each unit has a distinct mailing address.

CoCs are required to enter an address for all projects that are site-based (options 1 and 2, above). If a site-based project has multiple sites, the CoC should enter the address for the site where most beds and units are located.

**Victim Services Provider [Data Element 2.8, Field 5]:** Identify whether the project is a victim services provider and is prohibited from HMIS participation by the Violence Against Women Act (VAWA) and/or the McKinney-Vento Homeless Assistance Act. HUD is clarifying that, while DV providers are exempt from entering address information, they are expected to enter a ZIP code (see Appendix B for a definition of victim service provider).

Address [Data Element 2.8, Fields 9-12]: Address fields should reflect the location of the project's principal site or, for multiple site projects, the location in which the majority of the project's clients are housed. Tenant-based scattered site projects are only required to complete the geocode and ZIP Code fields based on where the majority of the clients are housed and may use the administrative address, if they wish to complete the remainder of the address fields. Victim Service Providers are not required to provide a street address.

**ZIP Code [Data Element 2.8, Field 6]:** ZIP codes must reflect the location of the project's principal site or, for multiple site or scattered site projects, the location in which the majority of the project's clients are housed.

#### 3.3.2 Bed and Unit Inventory Information

**Inventory Type:** Using **Inventory Start Date** and **Inventory End Date** [Data Element 2.7, Fields 2 and 3], identify whether the bed inventory is current or under development.

- 1) **Current inventory (C):** Beds and units that were available for occupancy on the night of the CoC's PIT count.
- 2) Under development (U): Beds and units that were fully funded but not available for occupancy on the night of the CoC's PIT count. For inventory identified as under development, CoCs must also identify whether the bed/unit inventory is expected to be available for occupancy 12 months from the night of the CoC's count. For example, in the 2019 HIC, if a CoC has a count date of January 31, 2019, CoCs must identify whether the bed/unit inventory is expected by January 31, 2020.

Beginning in 2019, HUD no longer distinguishes new inventory from current inventory. CoCs now report their data as either current (i.e., all inventory that is in operation on the night of the PIT count) or under development (i.e., all inventory that is projected but not in operation during the PIT count).

**Note:** If using HMIS data to generate the HIC, inventory that is under development could be entered into HMIS with an Inventory Start Date [Field 2] in the future that reflects the anticipated availability date; accordingly, inventory that is not yet fully funded should not be included in the HIC and either should not be entered into HMIS or entered in such a way as to enable differentiation (e.g. via customized fields).

**Disaster-Related Beds:** Beds that were funded specifically because of a presidentiallydeclared disaster. This information is not required to be captured in a CoC's HMIS.

**Bed Type [Data Element 2.7, Fields 8-10]** (*Emergency Shelter Only*): The Bed Type describes the type of beds offered by emergency shelter projects according to the following:

- 1) **Facility-based [Field 8]:** Beds (including cots or mats) located in a residential homeless assistance facility dedicated for use by persons who are homeless.
- 2) **Voucher [Field 9]:** Beds located in a hotel or motel and made available by the homeless assistance project through vouchers or other forms of payment.
- 3) **Other [Field 10]:** Beds located in a church or other facility not dedicated for use by persons who are homeless.

The Bed Type must be consistent with the Housing Type (i.e. a Facility-based emergency shelter project cannot have a Housing Type of "tenant based/scattered site").

Household Type [Data Element 2.7, Field 5]: Enter the counts of bed inventory, unit inventory, and HMIS bed inventory (detailed below) based on availability for each of the following household types:

- 1) **Households without children:** Beds and units typically serving households with adults only. This includes households composed of unaccompanied adults (including unaccompanied youth age 18-24) and multiple adults (including households with multiple youth ages 18 to 24). (Housing covered by the Fair Housing Act cannot deny admission to families with children.)
- 2) Households with at least one adult and one child: Beds and units typically serving households with (at least) one adult (including youth ages 18 to 24) and one child.
- 3) **Households with only children:** Beds and units typically serving households composed exclusively of persons under age 18, including one-child households, multi-child households or other household configurations composed only of children. For projects that have inventory designated for use by households with only children, care should be taken to ensure that this inventory is included in the HIC only in the category of households with only children, and not in the category for households with at least one adult and one child.

**Bed Inventory [Data Element 2.7, Field 6]:** The total number of beds available for occupancy on the night of the inventory count for each of the above-listed household types. For all of the relevant project types other than rapid re-housing (see Section 3.3.4), CoCs

must include all of the dedicated homeless beds and units available for homeless persons on the date of the inventory count, whether beds are current or under development (separate records will be created for each inventory type), regardless of whether the project participates in HMIS or not (separate records will be created for each inventory type), regardless of whether the project receives HUD funding, and regardless of whether the bed was occupied. CoCs need to remember that HIC beds can only be reported once, even if funding for the housing and services are from multiple sources that may be associated with different project types. For example, when SSVF funds are provided to pay for a crib or move-in costs for a household who is served in HUD-VASH, the inventory should only be reported in the HIC under the PSH inventory.

For inventory that was active on the night of the PIT count, CoCs should report the actual number of beds available for occupancy on that night in their HIC, even if it differs from the number projected in grant applications or calculated through some other approach to determining typical capacity.

This applies to projects both with and without a fixed number of beds. If a project has a fixed number of units/vouchers, but not a fixed number of beds, CoCs should estimate the number of beds available on the night of the PIT count by multiplying the number of units by the average household size observed on the PIT night.

For projects that serve multiple household types, but where a precise number of beds are not designated exclusively for a particular type of household, the total number of beds may be distributed among the household types served by the project using one of the methodologies described below. These same approaches can be used for determining the household type-distribution among dedicated beds for youth, veterans, and people who are chronically homeless.

- 1) Divide the beds based on how the bed(s) were used on the night of the count. If the facility is not at full capacity on the night of the count, then extrapolate the distribution based on the prorated distribution of those who are served on the night of the count.
- 2) Divide the beds based on average utilization. For example, a project has 100 beds that could be used by either households with only children or households with at least one adult and one child. If one-half of the beds are used by persons in households with only children on an average night and the other half are used by persons in households with at least one adult and one child, then include 50 beds for households with only children, and 50 beds for households with at least one adult and one child in the HIC.
- 3) Projects with a fixed number of units but no fixed number of beds can use a multiplier factor to estimate the number of beds (e.g., a program with 30 units and an average household size of 3 equals 90 beds for households with at least one adult and one child).

**Unit Inventory [Data Element 2.7, Field 7]:** The total number of units available for occupancy on the night of the inventory count for each of the above-listed household type. Projects that do not have a fixed number of units (e.g., a congregate shelter program) may record the bed inventory, the number of residential facilities operated by the program, or the

number of rooms used for overnight accommodation. For RRH projects, see instructions under Section 3.3.4.

**Dedicated Bed Inventory [Data Element 2.7, Fields 12-14]:** All beds that have been funded by HUD or another federal partner that are dedicated to one or more of the following subpopulations must be recorded in the appropriate category. A bed may be counted more than once across categories of dedicated beds (e.g., a project may have beds dedicated for persons who are both chronically homeless and a veteran). The number of beds for each subpopulation is a subset of the total bed inventory for a given project and must be equal to or less than the total bed inventory. A dedicated bed is a bed that <u>must</u> be filled by a person in the subpopulation category (or a member of their household) unless there are no persons from the subpopulation who qualify for the project located within the geographic area (see Appendix B for key terms).

CoCs must report their inventory that is <u>dedicated</u> to veterans, youth, and people experiencing chronic homelessness by household type, instead of providing a single number of dedicated beds. For instance, if a project has 10 beds dedicated to serving youth, instead of merely reporting 10 beds dedicated to youth, the CoC must report based on how many of the 10 beds are occupied by youth households with at least one adult and one child or are occupied by youth in households without children. None of the beds serving youth under 18 can be veteran beds. For these reasons, CoCs will not report veteran and youth beds under this category. For projects where the typical use of beds by different youth household types varies, but where a precise number of beds are not typically being used by a particular type of household, the CoC must refer to the section above on Household Type to determine how to distribute their beds by household type.

When reporting on dedicated beds for veterans, youth, and people experiencing chronic homelessness, CoCs should report all of the beds associated with the unit that is being provided to someone because they meet the criteria for which is it is dedicated. For example, if a project dedicates its beds and units to veteran families, the CoC should count all of the beds in each unit, even those occupied by family members who are not veterans, as part of their veteran bed inventory.

CoCs must report all dedicated beds for veterans, youth, and people experiencing chronic homelessness, even if a person who does not match that subpopulation happens to be in that inventory on the night of the count. HUD recognizes that there may be times when a dedicated bed may become available but there may not be someone to fill the bed who matches that subpopulation. CoCs are encouraged to continue to use that inventory for another person based on their own prioritization policies.

**Permanent Supportive Housing Chronic Homeless Bed Inventory:** The number of PSH beds that are dedicated to house chronically homeless persons and their household members (if applicable) for each of the household types: households without children, households with at least one adult and one child, and households with only children. A dedicated bed is a bed that **must** be filled by a chronically homeless person (or a member of their household), which is a higher standard than simply *prioritizing* persons experiencing chronic homelessness for available beds, e.g., per CPD Notice 16-11, Prioritizing Persons Experiencing Chronic

Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing.

**Veteran Bed Inventory:** The number of beds that are dedicated to house homeless veterans and their household members (if applicable) for households with at least one adult and one child and households without children.

**Youth Bed Inventory:** The number of beds that are dedicated to house homeless youth, including parenting youth and unaccompanied youth and their household members (if applicable) for households with at least one adult and one child and households without children (all inventory reported for households with only children are assumed to be youth beds).

**Emergency Shelter Bed and Unit Availability [Data Element 2.7, Field 11]:** Detailed household-level bed and unit-inventory counts by household type must be provided as described above for all year-round emergency shelter beds and units. For emergency shelter beds that are provided on a seasonal (during a defined period of high demand) or on an ad hoc or temporary basis as demand indicates, CoCs must enter a total count of such beds.

- 1) **Seasonal Beds:** Seasonal beds are not available year-round, but instead are available on a planned basis, with set start and end dates, during an anticipated period of higher demand. For the HIC, identify only the total number of seasonal beds available for occupancy on the night of the inventory count and indicate the start and end date for the season.
- 2) **Overflow Beds:** Overflow beds are available on an ad hoc or temporary basis during the year in response to demand that exceeds planned (year-round or seasonal) bed capacity. For the HIC, identify the total number of overflow beds that were available for occupancy on the night of the inventory count. If there is no fixed number of overflow beds, CoCs may instead report the number of overflow beds that were occupied on the night of the inventory count.

HMIS Participating Beds [Data Element 2.7, Field 15]: The number of beds participating in HMIS on the date of the HIC for each of the above-listed household types. The number of HMIS participating beds must be identified for year-round, seasonal, and overflow beds. For the purpose of reporting in the HIC, a bed is considered "an HMIS participating bed" if the project makes a reasonable effort to record all universal data elements on all clients served in that bed and discloses that information through agreed upon means to the HMIS Lead Agency at least once annually. For projects that serve a mixed population without a fixed number of beds per household type, record participating beds according to the Household Type instructions above.

Beginning in 2019, CoCs will report their HMIS participation based on the entire project. Either the project completely participates in HMIS or it does not. If part of a project's inventory participates in HMIS and another part does not, it should be split into two projects, one representing the inventory participating in HMIS and one representing the inventory not participating in HMIS.

#### 3.3.3 Point-in-Time Counts for Each Project

Each project recorded in the HIC must provide a PIT count. This number should be the unduplicated number of persons served on the night of the count in the beds reported for the project. This includes all persons who entered the project on or before the date of the HIC and PIT count, and who are either still in the project or exited after the date of the count. Although permanent housing projects are not included in the CoC-wide PIT count of homeless persons who are sheltered and unsheltered, all permanent housing projects must provide a PIT count for the HIC. Rapid re-housing projects should only count persons who are residing in permanent housing and being assisted by the RRH project on the night of the count.

#### Sheltered Person Counts on the HIC and PIT Must Be Equal

It is important for CoCs to closely coordinate their HIC and PIT counts and report only those persons who are considered homeless and staying in an emergency shelter, transitional housing, or Safe Haven project identified on the HIC. The total number of persons reported in all emergency shelter, transitional housing, and Safe Haven projects on the HIC *must* match the total number of sheltered persons reported in the PIT Population tab in the HDX.

As discussed earlier, the HIC and PIT count are integrally related. The sum total number of persons reported in emergency shelter, Safe Havens, and transitional housing projects in the PIT fields of the HIC **must match** the sum total of sheltered persons reported in the PIT count. As such, CoCs should conduct their annual housing inventory count on the same night as the CoC's designated PIT count night or as close as possible to the designated PIT count night. Any discrepancies between the sum total number of sheltered persons counted on the HIC and the number of sheltered persons counted on the PIT count will result in a validation error requiring the CoC to make corrections.

HUD strongly encourages the use of HMIS data to generate these counts for projects with 100 percent of beds participating in HMIS. CoCs must verify with project staff that HMIS data are complete and correct for the night of the HIC and PIT count, and that Project Entry and Project Exit Dates have been entered for all persons who entered or exited on or before the date of the count.

#### 3.3.4 Supplemental Inventory Instruction

Some common areas of confusion with regard to how to report some inventory are listed below:

**Rapid re-housing projects:** On any given night, an RRH project will have current participants who are still homeless (e.g., staying in an emergency shelter) and seeking permanent housing, and participants who have located and are residing in permanent housing.

For the purpose of reporting in the HIC, CoCs should count RRH beds and units based on the actual number of current project participants who are:

1) Actively enrolled in the project on the night of the inventory count, including persons who are only receiving supportive services in the RRH project; and

2) Are in permanent housing on the night of the inventory count [3.20 Housing Move-In Date could be used to identify RRH participants who have moved into permanent housing].

RRH projects that do not have any participants in permanent housing on the night of the inventory count (e.g., all participants are still in emergency shelter) should report zero (0) beds and zero (0) participants.

**VA Supportive Services for Veteran Families (SSVF) projects:** SSVF projects may offer both homelessness prevention and rapid re-housing assistance and may intermingle participants in the same project, though effective October 1, 2014, SSVF projects should be recording homelessness prevention and rapid re-housing participants in separate projects in HMIS. CoCs should not include in the HIC persons receiving SSVF homelessness prevention services on the night the inventory is conducted.

**VA Grant and Per Diem (GPD) projects:** VA recently designated components within its GPD program. Communities should continue to report GPD programs in the HIC. See <u>Section 3.1.1</u> for a detailed chart outlining what project types are associated with each GPD program component.

**HUD-VA Supportive Housing (VASH) Vouchers:** CoCs must count the total number of VASH vouchers available for use on the night of the HIC and PIT count, regardless of whether the voucher is presently being used. Vouchers are designated for use in a particular geographic location. CoCs should contact their local public housing authority or VA medical center that administers the VASH vouchers to determine the total number of vouchers available in the CoC. When a single project operates in multiple CoCs, each CoC should have project descriptor data pertaining to that project in their HMIS; beds should be apportioned according to the CoC in which the housing units assisted by the vouchers are physically located.

**RHY Basic Center Program (BCP) projects:** BCP projects may offer both emergency shelter and homelessness prevention. Projects providing both should be set up as two separate projects (i.e., BCP Emergency Shelter and BCP Prevention) and should be recording homelessness prevention and rapid re-housing participants in separate projects in HMIS. CoCs should not include in the HIC persons receiving BCP homelessness prevention services on the night the inventory is conducted or counted as part of the PIT count. See <u>Section 3.1.2</u> for more information about RHY Programs.

#### Projects serving runaway and homeless youth, including RHY-funded projects:

Generally, RHY projects should be included in the HIC. While eligibility for these programs sometimes differs from HUD eligibility requirements, HUD has decided to include these projects in the HIC. However, CoCs must exclude beds that are dedicated for persons who are wards of the state, including children who are in foster care or who are otherwise under government custody or supervision. If beds are not specifically dedicated to wards of the state, then the CoC must pro-rate beds based on who is occupying the bed on the night of the count, excluding those beds occupied by persons who are wards of the state, or pro-rate beds based on average utilization of persons who are and are not wards of the state. CoCs, using HMIS as a starting point to generate the HIC, could use **4.22 RHY-BCP Status** to identify which BCP beds to include in the HIC. See <u>Section 3.1.2</u> for more information about RHY Programs.

**Projects That Operate In More Than One CoC:** CoC codes are published annually by HUD in the CoC Program NOFA and are associated with specific geographic areas. In some cases, a project might operate in more than one CoC (e.g., some ESG projects and projects funded by non-HUD sources). The 2017 HMIS Data Standards require that HMIS allow for multiple codes to be selected per project when projects operate in multiple CoCs but only enter data in one CoC's HMIS via **Continuum of Care Code [2.3]**. In such cases, the **Client Location [3.16]** data element must be used to associate each client with the correct CoC where they are being assisted. Ordinarily, projects that are physically located in multiple CoCs must be recorded as a distinct project within each CoC's HMIS. Until this capacity is completely available, each CoC should have project descriptor data pertaining to that project recorded in the HMIS serving the CoC; beds should be apportioned between the CoCs based on their physical locations as of the date of the HIC.

Beds with an Inventory Type of "Under development" must be divided between CoCs based on location of projected use, if that information is available. If information about the location of projected use is not available, all of the beds may be allocated to the CoC in which the project principal service site or administrative office is located.

CoCs must note that projects funded under the CoC Program Competition are awarded for specific geographic areas and the projects are limited to the areas identified and approved in their Project Application, except for tenant-based rental assistance where a survivor of domestic violence might move out of the area and continue to receive their rental assistance. ESG recipients might fund activities outside their boundaries (potentially in more than one CoC's geography) if the activities benefit the ESG recipients' population.

## 4. POINT-IN-TIME COUNT REQUIREMENTS

Under Section 578.7 of the CoC Program interim rule, CoCs must plan and conduct, at least biennially, a Point-in-Time Count of homeless persons within the geographic area. Section 578.3 of the CoC Program interim rule defines *Point-in-Time Count* as a "count of sheltered and unsheltered homeless persons carried out on one night in the last 10 calendar days of January or at such other time as required by HUD." **CoCs are required to conduct a PIT count at least biennially during the last 10 days of January.** CoCs that are considering performing their required PIT count outside of the last 10 days of January must request a PIT count date exception from HUD. No HUD permission or exception is required for CoCs to conduct supplemental PIT counts.

CoCs must ensure that their count estimate accurately reflects what they believe to be the entire sheltered and unsheltered population for the CoC's entire geographic area. For example, if a CoC only counts unsheltered people in selected areas, they need to consider whether there are likely unsheltered homeless persons in other areas of the CoC and, if so, how to account for them. This is particularly important when entire counties, communities, or larger geographic areas are not covered. CoCs should use sampling and extrapolation methods to account for areas that were not included in the unsheltered count, if there is any possibility an unsheltered person could be found there. The *Point-in-Time Count Methodology Guide* and the <u>Point-in-Time (PIT)</u> <u>Count Standards and Methodologies Training</u> provides helpful tips on how to properly account for areas not included in a count.

In some CoCs, there might be geographic areas that CoCs are not required to incorporate into the count. These might include deserts, dense forests, and other remote locations that are uninhabitable by people. Additionally, there are some areas where the CoC may have counted for several years and found no persons experiencing homelessness. In making the decision to exclude some geography, it is important that CoCs discuss these regions with people knowledgeable about the areas, and then document the decision-making process that is used to decide if a specific area will not be included in the PIT count. Areas that are excluded from a CoCs unsheltered count should be identified in the CoC's PIT count plan that is approved by the CoC governing board. CoCs should be prepared to provide this information to HUD through HUD's CoC Program Competition.

CoCs are required to submit their PIT count data through the <u>HUD HDX website</u>. Additionally, CoCs must provide PIT count data to the entity responsible for the Consolidated Plan jurisdiction(s) located within the CoC, when requested. This includes providing PIT count data at the geocode level for each jurisdiction required to report PIT count data in the Consolidated Plan. There could be one or more Consolidated Plan jurisdictions a CoC covers. In turn, HUD expects states and entitlement communities responsible for completing Consolidated Plans to participate in the PIT count.

The PIT count should be completed using unduplicated counts or statistically reliable estimates of homeless persons in <u>both</u> sheltered and unsheltered locations on a single night. **HUD** requires that PIT counts be conducted in compliance with HUD counting standards and related methodology guidance, as described in HUD's <u>Point-in-Time Count Methodology</u> <u>Guide</u> available on the <u>HUD Exchange</u>.

Compliance with HUD standards could result in a more accurate and, potentially, higher or lower PIT count than in the past. CoCs will have the ability to explain changes in PIT counts that are due to methodology improvements in the CoC Program competition application and HUD will take such changes into account in the application review and scoring process. Questions about whether your community's counting methodologies meet HUD's requirements as outlined in the guidance should be submitted to <u>Ask A Question</u>.

It is important to note that the PIT count only identifies a subset of individuals and families that meet HUD's definition of homeless. As such, the PIT count does not capture everybody who is eligible for homeless assistance through HUD or other homeless assistance funding sources.

The following sections detail PIT count data collection requirements for CoCs.

### **4.1 People Who Must Be Counted in the PIT Count**

### 4.1.1 Sheltered Count

CoCs must count all individuals or families who meet the criteria in paragraph (1)(ii) of the homeless definition in 24 CFR 578.3. This includes individuals and families *"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)* on the night designated for the count. This includes individuals residing in Safe Haven projects.

CoCs should report on people based on where they are sleeping on the night of the count, as opposed to the program they are enrolled in. **RRH is considered permanent housing** and, therefore, individuals and families who are enrolled in RRH *and* residing in permanent housing on the night of the PIT count are not included in the sheltered count. However, homeless households currently residing on the street, in an emergency shelter, transitional housing, or Safe Haven, but who are also enrolled in an RRH project and awaiting housing placement, should be counted based on where they resided on the night of the count. For example, a person residing in an emergency shelter and being assisted by an RRH project to obtain housing must be counted in the sheltered PIT count for the emergency shelter.

Persons enrolled in the TH project of a HUD-funded joint TH/RRH grant should be counted as sheltered homeless, if they are being served and do not yet have a rapid re-housing movein date recorded.

For a detailed listing of all projects to include in the PIT count, please see Appendix A.

## 4.1.2 Unsheltered Count

CoCs must count all individuals or families who meet the criteria in paragraph (1)(i) of the homeless definition in 24 CFR 578.3. This includes individuals and families "*with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground"* on the night designated for the count. RRH-assisted households who are still unsheltered on the night of the count (e.g., staying in an encampment and being assisted by an RRH project to obtain housing) must be included as part of the unsheltered count.

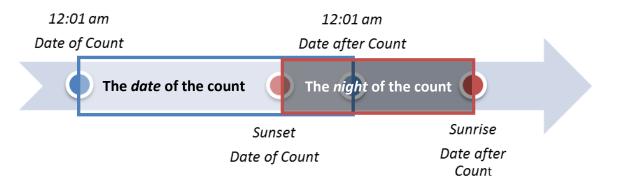
#### 4.2 People Who Must NOT Be Included in the PIT Count

Individuals and families residing in the following locations on the night of the count are prohibited from being included in the sheltered or unsheltered PIT count:

- A. Persons residing in PSH programs, including persons housed using HUD Veterans Affairs Supportive Housing (VASH) vouchers.
- B. Persons residing in OPH housing, including persons in a GPD Transition in Place (TIP) project on the night of the count.
- C. Persons counted in any location not listed on the HIC (e.g., staying in projects with beds/units not dedicated for persons who are homeless).
- D. Persons temporarily staying with family or friends (i.e., "doubled-up" or "couch surfing").
- E. Persons residing in housing they rent or own (i.e., permanent housing), including persons residing in rental housing with assistance from a RRH project on the night of the count.
- F. Persons residing in institutions (e.g., jails, juvenile correction facilities, foster care, hospital beds, detox centers).

#### 4.3 The Timing of the PIT Count

A critical step to ensuring that the same number of persons is reported on the HIC and PIT count is to conduct both counts during the same time period. HUD requires that CoCs identify the date on which the count was conducted; however, the term 'night' signifies a single period of time from sunset to sunrise, which spans two actual dates. The 'night of the count' begins at sunset on the date of the count and ends at sunrise on the following day, as shown in the illustration below.



#### The Night of the Count - Illustrated

Often, CoCs conduct unsheltered counts at times that could be generally referred to as 'the middle of the night.' For example, before sending individuals conducting the unsheltered count out at 3 a.m. in January, it is important to identify that if 'the date of the count' is January 25, then 'the night of the count' starts at sunset on January 25, and ends at sunrise by January 26 – so while the date of the count is January 25, the unsheltered count might actually be conducted on the following date.

For the sheltered count, include all persons who:

- A. Entered on or before the date of the count; and
- B. Exited after the date of the count (or have not yet exited).

#### 4.4 Population Data

As in prior years, CoCs must collect and report information on the demographic characteristics of all people reported as sheltered or unsheltered by household type and, within each household type, by age category, gender, race, and ethnicity. CoCs must also report information by household type for veteran and youth households. Since CoCs are unlikely to have demographic data from all people included in the PIT count, CoCs might have to estimate characteristics for some people. Such estimates must adhere to HUD's minimum standards for PIT counts, as explained in HUD's <u>Point-in-Time Count Methodology Guide</u>.

CoCs must provide demographic data for both sheltered and unsheltered persons according to the following three household types:

- A. **Persons in households with at least one adult and one child.** This category includes households with one adult and at least one child under age 18.
- B. **Persons in households without children.** This category includes single adults, adult couples with no children, and groups of adults (including adult parents with their adult children).
- C. **Persons in households with only children.** This category includes persons under age 18, including children in one-child households, adolescent parents (under age 18) and their children, adolescent siblings, or other household configurations composed only of children.

CoCs must report the total number of persons and households, by age category, for each household type, per below.

- A. Persons in households with at least one adult and one child:
  - (1) The number of children under age 18;
  - (2) The number of young adults ages 18 to 24; and
  - (3) The number of adults over age 24.
- B. Persons in households without children:
  - (1) The number of young adults ages 18 to 24; and
  - (2) The number of adults over age 24.

CoCs must report data on the gender, race, and ethnicity for **all** sheltered and unsheltered persons. In some instances, a CoC may not have certain demographic data for a homeless person. This may be because the person refused to provide the information or it was not possible to collect it during the PIT count. In these instances, a CoC should estimate the missing demographic information using available data and a methodology consistent with HUD PIT methodology standards and guidance. The <u>PIT Count Extrapolation Tool</u>, available on HUD Exchange, may also be useful to calculate these estimates.

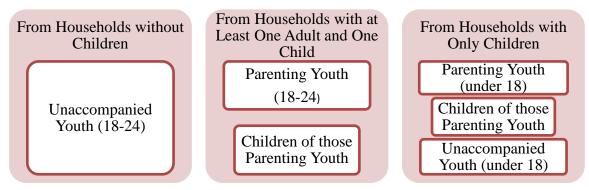
Please note that an individual may identify with several race categories and CoCs should allow them to identify with multiple race categories. However, for the purpose of data reporting, people that

identify with multiple race categories <u>should only</u> be counted under "multiple races" and should not be counted in each specific race category they identified with. For example, Jane indicated that she is "Black or African American" and "White." For the PIT count, Jane is only included in the count of persons who are "multiple races" and she is not included in the count of persons who are "Black or African American" or "White."

CoCs must also collect and report data on veterans, including the total number of veteran households, the total number of veterans, the total number of persons in veteran households, and the gender, race, and ethnicity of veterans. A "veteran household" includes households with one or more veterans who might be presenting with other persons. Please note that data for the gender, race, and ethnicity of non-veterans in veteran households will only be reported under "All Households" population data in Appendix C. CoCs should not include veterans in VADOM or VA-funded CWT/TR facilities in their PIT count.

CoCs must report data on persons in Youth Households, including the gender, race, and ethnicity for parenting youth and unaccompanied youth, as outlined in Appendix C. However, while gender, race, and ethnicity are reported for all unaccompanied youth, CoCs will only report the gender, race, and ethnicity on the parents in the parenting youth households. Parenting youth are youth who identify as the parent or legal guardian of one or more children who are present with or sleeping in the same place as that youth parent, where there is no person over age 24 in the household. Parenting youth are either a subset of households with at least one adult and one child if the parenting youth is between 18 and 24, or households with only children if the parenting youth is under 18. CoCs should report the numbers of children in parenting youth households separately for households with parenting youth are persons under age 25 who are not presenting or sleeping in the same place as their parent or legal guardian or their own children. Unaccompanied youth are either a subset of households without children, if they are 18 to 24, or households with only children, if they are under 18.

#### **Relationship of Household Types and Youth Categories**



Veterans, parenting youth, and unaccompanied youth data are a **subset** of the "All Households" data and should still be included in the "All Households" data.

CoCs must also report the number of chronically homeless households and chronically homeless persons in each household type for "All Households," "Veteran Households," and "Youth Households." Veterans and youth who are chronically homeless are also a subset of "All Households" and should still be included in the "All Households" data.

For purposes of the PIT count, persons living in transitional housing at the time of the PIT count should not be counted as chronically homeless. Please refer to Appendix B for additional details on the definitions for chronically homeless persons for purposes of the PIT count.

A chronically homeless household includes at least one adult or minor head of household who is identified as chronically homeless. For households of more than one person, when one household member qualifies as chronically homeless, all members of that household should be counted as chronically homeless. For example, if one adult in a two-adult household is identified as chronically homeless, both adults should be counted as a chronically homeless person in the households without children category of the PIT count.

Appendix C illustrates the population data reporting requirements in a table format for reference.

### 4.5 Additional Homeless Population Data

CoCs must collect and report counts of people who qualify as one of the specific additional populations among sheltered and unsheltered persons according to the chart below. *Additional homeless population data should be limited to adults*. Reporting on the number of sheltered and unsheltered survivors of domestic violence will continue to be optional. However, for CoCs that choose to identify and report on survivors of domestic violence, they must only report the number of survivors of domestic violence who are currently experiencing homelessness because of domestic violence, dating violence, sexual assault, or stalking, as opposed to reporting on survivors who have ever experienced these circumstances.

When collecting data on disability status for the PIT count, CoCs must ensure:

- A. Volunteers administering the survey know that these questions must be asked of all persons being surveyed and it is completely voluntary whether persons respond to questions about disability status, and
- B. Persons being surveyed are informed prior to responding to any disability question that their response is voluntary and that their refusal to respond will not result in a denial of service.

No questions should be posed regarding the nature or severity of the person's disability (e.g., medical and health information). Where information is necessary to establish that an individual fits into a particular additional homeless population (e.g., survivors of domestic violence), the individual should be apprised of the criteria and asked whether he or she meets the definition.

Appendix D illustrates the additional homeless population data reporting requirements in a table for reference.

#### 4.6 Using HMIS Data for the PIT

CoCs are strongly encouraged to use HMIS to generate PIT count data for projects with 100 percent of their beds participating in HMIS. Before submitting data, CoCs should verify with project staff that HMIS data are complete and correct for the night of the PIT count and that exit dates have been entered for all persons who exited the project on or before the date of the PIT count. PIT count data that may need to be derived from HMIS, rather than reported directly from a data field include: gender, chronically homeless status, substance use disorder, serious mental illness, and domestic

violence. Please see the <u>Sheltered PIT Count and HMIS Data Element Crosswalk</u> for more information.

## **4.7 PIT Count Date Exception**

Per Sections 578.3 and 578.7 of the CoC Program interim rule, CoCs must conduct their PIT count in the last 10 calendar days of January or at such other time as required by HUD. CoCs may request an exception to the required timeframe for good cause. If HUD grants an exception to conducting the PIT count within the last 10 days of January, HUD usually requires that the count be conducted within the last 10 days of February. To submit an exception request, CoCs must send an email to William Snow (William.Snow@hud.gov) that includes why an exception is being requested and when they propose to conduct the count.

HUD only grants exceptions for three types of good cause, which include:

- A. A longstanding tradition for performing such a count at a date between December 1 and March 31;
- B. Unanticipated inclement weather (e.g., snow storm, hurricane, tornado) and other natural disasters; and
- C. Other reasons HUD deems would have a negative impact on the accuracy and completeness of a CoC's count.

## 4.7 PIT Count Methodology Questions

CoCs are required to report to both the sheltered and unsheltered counting methodologies. This information is used by HUD to understand the approaches used by CoCs to conduct their PIT counts and the consistency of the approach with HUD published methodology guidance and standards. For the sheltered population, CoCs will report on data sources used to complete the count (for example, HMIS, provider surveys, and client-level surveys); any sampling strategy used; and their de-duplication strategy. For additional sheltered populations (defined in 4.5) or subsets of populations (such as people experiencing chronic homelessness, unaccompanied youth, and veterans), CoCs will report data sources used for the count; ways in which CoCs collected demographic and other data on characteristics; and whether CoCs statistically adjusted data in some way.

CoCs will also need to report on the unsheltered count methodologies used. CoCs will be asked to report the approach used to count the number of people staying in unsheltered locations on the night of the count (e.g., complete census, known location count, or random sample of locations); whether and how the CoCs statistically adjusted their count to account for uncanvassed areas; and de-duplication approaches used. For additional unsheltered populations (defined in 4.5) or subsets of populations (such as people experiencing chronic homelessness, unaccompanied youth, and veterans), CoCs will report on the methods used to collect demographic and other data on characteristics on the unsheltered population on the night of the PIT count.

For both sheltered and unsheltered counts, CoCs will also be asked to select reasons they believe their CoC experienced changes in their PIT counts, if applicable.

HUD may request CoCs provide additional information concerning the sampling sizes used for sheltered and unsheltered total person counts and the count of people with different demographic and population characteristics. This will allow HUD to better understand the number of actual

people a CoC is able to count and obtain information for, compared with the number of people a CoC is estimating information for, using different methodologies.

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
	Emergency shelters for homeless persons	Include all emergency shelters funded by HUD ESG and/or other federal, state and local public and private sources, including domestic violence shelters. If ESG funded, in the "HUD McKinney-Vento Funded" field, must identify project in HIC as HUD: ESG- Emergency Shelter	Yes	Yes
	Emergency shelters for homeless youth	Include all emergency shelters for homeless youth funded by federal, state, and local public and private sources	Yes	Yes
Emergency Shelter	Hotel/motel vouchers	Include only vouchers paid for by charitable organizations or by federal, state, or local government programs for low-income individuals	Yes	Yes
	VA-funded Contract Residential Services (CRS - a consolidation of the former HCHV Community Contract Emergency Housing and Community Contract Residential Treatment Programs)	Include all VA-funded CRS (the consolidation of HCHV/EH and HCHV/RT) projects In the "Additional Federal Funding Sources" field, must identify project in HIC as VA: CRS Contract Residential Services	Yes	Yes
	HHS-funded Runaway and Homeless Youth (RHY) Basic Center Programs (BCP)	In the "Additional Federal Funding Sources" field, must identify project in HIC as HHS: RHY – BCP	Yes	Yes

## APPENDIX A – SUMMARY OF PROJECTS TO INCLUDE IN THE HIC AND PIT COUNT

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
	HUD-funded transitional housing projects	Include all transitional housing projects funded by HUD If CoC funded, in the "HUD McKinney-Vento Funded" field, must identify project in HIC as HUD: CoC- Transitional Housing	Yes	Yes
	Transitional housing projects with HUD joint component funding	Include all HUD CoC funded rapid re-housing projects that are funded by the joint component resources In the "HUD McKinney- Vento Funded" field, must identify project in HIC as HUD: CoC-Rapid Re- Housing AND HUD: CoC- Transitional Housing	Yes	Yes
	Other transitional housing projects for homeless persons	Include all transitional housing projects for homeless persons funded by other federal, state, and local public and private sources	Yes	Yes
Transitional Housing	<ul> <li>HHS-funded RHY transitional housing projects, including:</li> <li>Transitional Living Programs (TLP)</li> <li>Maternity Group Homes for Pregnant and Parenting Youth (MGH)</li> <li>Support System for Rural Homeless Youth (Demo TLP)</li> </ul>	In the "Additional Federal Funding Sources" field, must identify project in HIC as HHS: RHY TLP or RHY MGH	Yes	Yes

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
	Other transitional housing projects for homeless youth	Include all transitional housing projects for homeless youth funded by federal, state, and local public and private sources	Yes	Yes
	<ul> <li>VA-funded transitional housing projects, including:</li> <li>VA Grant and Per Diem – Bridge Housing</li> <li>VA Grant and Per Diem – Service Intensive Transitional Housing</li> <li>VA Grant and Per Diem – Hospital to Housing</li> <li>VA Grant and Per Diem – Hospital to Housing</li> <li>VA Grant and Per Diem – Clinical Treatment</li> </ul>	<ul> <li>Include VA-funded GPD, except low demand and transition in place projects, and CWT/TR projects</li> <li>In the "Additional Federal Funding Sources" field, must identify project in HIC as</li> <li>VA: GPD Bridge</li> <li>VA: GPD Service Intensive</li> <li>VA: GPD Hospital to Housing</li> </ul>	Yes	Yes

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
	HUD-funded Safe Haven programs	Include all Safe Haven projects funded by HUD SHP and HUD CoC Program In the "HUD McKinney- Vento Funded" field, must identify project in HIC as HUD: CoC-Safe Haven	Yes	Yes
Safe Haven	VA-funded Health Care for Homeless Veterans (HCHV) VA Low Demand Safe Haven Program VA Grant and Per Diem – Low Demand	Include all VA-funded HCHV/SH projects and VA GPD- low demand projects In the "Additional Federal Funding Sources" field, must identify project in HIC as VA: GPD – Low Demand or VA: Community Contract Safe Haven Program	Yes	Yes
	<b><u>RRH</u></b> HUD-funded rapid re- housing projects	Include all HUD CoC and ESG-funded rapid re- housing projects In the "HUD McKinney- Vento Funded" field, must identify project in HIC as HUD: ESG-Rapid Re- Housing or CoC-Rapid Re- Housing	Yes	No
Permanent Housing (Rapid Re- housing and Permanent Supportive Housing only)	<b><u>RRH</u></b> Rapid re-housing projects with HUD joint component funding	Include all HUD CoC funded rapid re-housing projects that are funded by the joint component resources In the "HUD McKinney- Vento Funded" field, must identify project in HIC as HUD: CoC-Rapid Re- Housing AND HUD: CoC- Transitional Housing	Yes	No
	<b><u>RRH</u></b> Other rapid re- housing projects for homeless persons	Include all rapid re-housing projects for homeless persons funded by other federal, state and local public and private sources	Yes	No

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
	<b><u>RRH</u></b> VA-funded Supportive Services for Veteran Families (SSVF) projects	In the "Additional Federal Funding Sources" field, must identify project in HIC as VA: SSVF	Yes	No
	<b>PSH</b> Permanent supportive housing projects for homeless persons	Include all permanent supportive housing projects funded by HUD, and/or other federal, state and local public and private sources For scattered site projects, include total number of units available for occupancy or total number of vouchers available for use in the CoC on night designated for the count If HUD funded, in the "HUD McKinney-Vento Funded" field, must identify project in HIC as HUD: CoC- Permanent Supportive Housing, CoC-Supportive Services Only, SHP, SPC, or SRO	Yes	No
	<b><u>PSH</u></b> HUD-funded Veterans Affairs Supportive Housing	Include all HUD-funded projects utilizing VASH vouchers In the "Additional Federal Funding Sources" field, must identify project in HIC as HUD: HUD/VASH	Yes	No
	Other permanent housing projects, excluding PSH and RRH, for homeless persons	Include any PH project that is designated for homeless people that provides housing and services or housing only, but for which disability is not required for entry, includes SRO projects.	Yes	No

HIC Project Type	Projects to Include	Instructions	Include PIT data on the HIC?	Include PIT data in PIT sheltered count?
Other Permanent Housing (OPH)	<ul> <li>VA-funded other permanent housing projects, including:</li> <li>VA Grant and Per Diem Transition in Place</li> </ul>	Include VA-funded GPD TIP projects In the "Additional Federal Funding Sources" field, must identify project in HIC as VA: GPD TIP	Yes	No

## **APPENDIX B – KEY TERMS**

These definitions do not fully correspond to the program requirements of HUD funding streams and must only be used for the purposes of the HIC and PIT.

Adults – Persons age 18 and older.

Child – Persons under age 18.

Chronically Homeless Person - A person who:

- A. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- B. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 1 year or on at least four separate occasions in the last 3 years where the combined length of time homeless in those occasions <u>is at least 12 months</u>; and
- C. Has a disability.

**Note:** For purposes of PIT reporting:

(1) When a household with one or more members includes an adult or minor head of household who qualifies as chronically homeless, then all members of that household should be counted as a chronically homeless person in the applicable household type table. For example, if one adult in a two adult household is identified as chronically homeless, both adults should be counted as a chronically homeless person in the households without children category of the PIT count.

**Disability** – An individual with one or more of the following conditions:

- A. A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury that:
  - (1) Is expected to be long-continuing or of indefinite duration;
  - (2) Substantially impedes the individual's ability to live independently; and
  - (3) Could be improved by the provision of more suitable housing conditions.
- B. A developmental disability, as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C. 15002); or
- C. The disease of Acquired Immunodeficiency Syndrome (AIDS) or any condition arising from the etiologic agency for Acquired Immunodeficiency Syndrome.

Adults with HIV/AIDS – This population category of the PIT includes adults who have been diagnosed with AIDS and/or have tested positive for HIV.

Adults with a Serious Mental Illness (SMI) – This population category of the PIT includes adults with a severe and persistent mental illness or emotional impairment that seriously limits a person's ability to live independently. Adults with SMI must also meet the qualifications identified in the term for "disability" (e.g., "is expected to be long-continuing or indefinite duration").

Adults with a Substance Use Disorder–This population category of the PIT includes adults with a substance abuse problem (alcohol abuse, drug abuse, or both). Adults with a substance use disorder must also meet the qualifications identified in the term for "disability" (e.g., "is expected to be long-continuing or indefinite duration").

**Survivors of Domestic Violence**–This population category of the PIT includes adults who are currently experiencing homelessness because they are fleeing domestic violence, dating violence, sexual assault, or stalking.

**Veteran**–This population category of the PIT includes adults who have served on active duty in the Armed Forces of the United States. This does not include inactive military reserves or the National Guard unless the person was called up to active duty.

**Victim Service Provider** – A private nonprofit organization whose primary mission is to provide services to survivors of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

**Youth** – Persons under age 25. HUD collects and reports youth data based on persons under 18 and persons between ages 18 and 24.

**Parenting Youth** – A youth who identifies as the parent or legal guardian of one or more children who are present with or sleeping in the same place as that youth parent, where there is no person over age 24 in the household.

**Unaccompanied Youth** – Unaccompanied youth are persons under age 25 who are <u>not</u> accompanied by a parent or guardian and are <u>not</u> a parent presenting with or sleeping in the same place as his/her child(ren). Unaccompanied youth are single youth, youth couples, and groups of youth presenting together as a household.

# All Households

### Households with at Least One Adult and One Child

	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of households				
Total number of persons (adults & children)				
Number of children (under age 18)				
Number of young adults (age 18 to 24)				
Number of adults (over age 24)				
Gender (adults and children)	Sheltered ES	Sheltered TH	Unsheltered	Total
Female				
Male				
Transgender				
Gender Non-Conforming (i.e., not exclusively male or female)				
Ethnicity (adults and children)	Sheltered ES	Sheltered TH	Unsheltered	Total
Non-Hispanic/Non-Latino				
Hispanic/Latino				
Race (adults and children)	Sheltered ES	Sheltered TH	Unsheltered	Total
White				
Black or African-American				
Asian				
American Indian or Alaska Native				
Native Hawaiian or Other Pacific Islander				
Multiple Races				
Chronically Homeless	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of households		NA		

	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of persons		N/A		

## Households without Children

	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of households					
Total number of persons					
Number of young adults (age 18 to 24)					
Number of adults (over age 24)					
Gender	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Female					
Male					
Transgender					
Gender Non-Conforming (i.e., not exclusively male or female)					
Ethnicity	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Non-Hispanic/Non-Latino					
Hispanic/Latino					
Race	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
White					
Black or African-American					
Asian					
American Indian or Alaska Native					
Native Hawaiian or Other Pacific Islander					
Multiple Races					
Chronically Homeless	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total

	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of persons		N/A			

# Households with Only Children (under age 18)

	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of households					
Total number of children (persons under age 18)					
Gender	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Female					
Male					
Transgender					
Gender Non-Conforming (i.e., not exclusively male or female)					
Ethnicity	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Non-Hispanic/Non-Latino					
Hispanic/Latino					
Race	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
White					
Black or African-American					
Asian					
American Indian or Alaska Native					
Native Hawaiian or Other Pacific Islander					
Multiple Races					
Chronically Homeless	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of persons		N/A			

# Veteran Households Only

#### Veteran Households with at Least One Adult and One Child

	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of households				
Total number of persons				
Total number of veterans				
Gender (veterans only)	Sheltered ES	Sheltered TH	Unsheltered	Total
Female				
Male				
Transgender				
Gender Non-Conforming (i.e., not exclusively male or female)				
Ethnicity (veterans only)	Sheltered ES	Sheltered TH	Unsheltered	Total
Non-Hispanic/Non-Latino				
Hispanic/Latino				
Race (veterans only)	Sheltered ES	Sheltered TH	Unsheltered	Total
White				
Black or African-American				
Asian				
American Indian or Alaska Native				
Native Hawaiian or Other Pacific Islander				
Multiple Races				
Chronically Homeless	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of households		N/A		
Total number of persons		N/A		

## Veteran Households without Children

	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of households					
Total number of persons					
Total number of veterans					
Gender (veterans only)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Female					
Male					
Transgender					
Gender Non-Conforming (i.e., not exclusively male or female)					
Ethnicity (veterans only)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Non-Hispanic/Non-Latino					
Hispanic/Latino					
Race (veterans only)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
White					
Black or African-American					
Asian					
American Indian or Alaska Native					
Native Hawaiian or Other Pacific Islander					
Multiple Races					
Chronically Homeless	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of persons		N/A			

# Youth Households

### **Unaccompanied Youth Households**

Unaccompanied Youth Households	Sheltered	Sheltered	Sheltered		
	ES	TH	SHOLET CU	Unsheltered	Total
Total number of unaccompanied youth households					
Total number of unaccompanied youth					
Number of unaccompanied youth (under age 18)					
Number of unaccompanied youth (age 18 and 24)					
Gender (unaccompanied youth)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Female					
Male					
Transgender					
Gender Non-Conforming (i.e., not exclusively male or female)					
Ethnicity (unaccompanied youth)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Non-Hispanic/Non-Latino					
Hispanic/Latino					
Race (unaccompanied youth)	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
White					
Black or African-American					
Asian					
American Indian or Alaska Native					
Native Hawaiian or Other Pacific Islander					
Multiple Races					
Chronically Homeless	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Total number of persons		N/A			

## **Parenting Youth Households**

	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of parenting youth households				
Total number of persons in parenting youth households				
Total Parenting Youth (youth parents only)				
Total Children in Parenting Youth Households				
Number of parenting youth under age 18				
Children in households with parenting youth under age 18				
Number of parenting youth age 18 to 24				
Children in households with parenting youth age 18 to 24				
Gender (youth parents only)	Sheltered ES	Sheltered TH	Unsheltered	Total
Female				
Male				
Transgender				
Gender Non-Conforming (i.e., not exclusively male or female)				
Ethnicity (youth parents only)	Sheltered ES	Sheltered TH	Unsheltered	Total
Non-Hispanic/Non-Latino				
Hispanic/Latino				
Race (youth parents only)	Sheltered ES	Sheltered TH	Unsheltered	Total
White				
Black or African-American				
Asian				
American Indian or Alaska Native				
Native Hawaiian or Other Pacific Islander				
Multiple Races				
Chronically Homeless	Sheltered ES	Sheltered TH	Unsheltered	Total
Total number of households		N/A		
Total number of persons		N/A		

## APPENDIX D – ADDITIONAL HOMELESS POPULATIONS REPORTING REQUIREMENTS FOR THE PIT COUNT

### **Additional Homeless Populations**

	Sheltered ES	Sheltered TH	Sheltered SH	Unsheltered	Total
Adults with a Serious Mental Illness					
Adults with a Substance Use Disorder					
Adults with HIV/AIDS					
Adult Survivors of Domestic Violence (optional)					