

Homeless System Response: Emergency Housing Vouchers Funding Briefs: Permanent Supportive Housing (PSH) and Supportive Services

Purpose

The Emergency Housing Voucher (EHV) program (see [Notice PIH 2021-15](#) for details) is a new housing voucher program, funded by the American Rescue Plan (ARP), that provides 70,000 housing vouchers through Public Housing Agencies (PHAs) to assist people who are experiencing or at risk of experiencing homelessness; are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless. Implementation of EHV must be done in partnership with the Continuum of Care (CoC) and Victim Services Providers (VSPs). CoCs are encouraged to offer or make connections to supportive services for households referred to the PHA for EHV.

The purpose of the *EHV Funding Briefs Series* is to provide information on funding that can be utilized to provide services and resources to eligible EHV households. This brief will focus on CoC funds for permanent supportive housing (PSH) for persons with disabilities.

Eligibility

In order to pair EHV with PSH supportive services, households must be:

- Prioritized and eligible for EHV (see [Notice PIH 2021-15](#)).
- Prioritized and eligible for PSH assistance or currently enrolled in PSH and were homeless at the time of admission to that program.

Emergency Housing Vouchers Eligible Populations (per PIH Notice 2021-15)	Eligible for CoC PSH?
<p>a. Homeless under one of the following categories:</p> <ol style="list-style-type: none"> 1. Literally Homeless. 2. Imminent Risk of Homelessness. 3. Homeless Under Other Federal Statutes. 4. Fleeing/Attempting to Flee Domestic Violence. 	<p>Households must include at least one adult or child with a disability. Specific eligibility will depend on:</p> <ul style="list-style-type: none"> • The Notice of Funding Availability (NOFA) under which the PSH project was originally funded. • The NOFA from the applicable grant year. • The details in the project’s grant agreement. <p>Many PSH projects are dedicated to serving households experiencing chronic homelessness or households that meet additional criteria, known as DedicatedPLUS.</p>
<p>b. At Risk of Homelessness, under one of the following:</p> <ol style="list-style-type: none"> 1. An individual or family who: <ul style="list-style-type: none"> • Has an income below 30% of Area Median Income (AMI). • Does not have sufficient resources or support networks to prevent homelessness. • Meets one of a set of criteria indicating housing instability. 2. A child or youth who qualifies as homeless under other federal statutes. 3. A child or youth that qualifies as “homeless” under Section 725(2) of the McKinney-Vento Homeless Assistance Act and the parent(s) or guardians (if living with them). 	<p>No</p>

Emergency Housing Vouchers Eligible Populations (per PIH Notice 2021-15)	Eligible for CoC PSH?
c. Individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.	Households must include at least one adult or child with a disability. Specific eligibility will depend on: <ul style="list-style-type: none"> • The NOFA under which the PSH project was originally funded. • The NOFA from the applicable grant year. • The details in the project’s grant agreement. Many PSH projects are dedicated to serving households experiencing chronic homelessness or households that meet additional criteria, known as DedicatedPLUS .
d. Individuals or families who are recently homeless as determined by the CoC, including participants in rapid rehousing (RRH) and PSH programs.	Program participants receiving RRH maintain their homeless status or chronically homeless status as applicable; so, if they meet other eligibility criteria for CoC PSH, they may be able to bridge from RRH to PSH, as appropriate.

For more details on eligibility, see [Homeless Eligibility Overview](#) and [Determining and Documenting Disability Status](#). *Note: Additional PSH eligibility criteria may be established in the annual Fiscal Year NOFA under which the project was most recently renewed and is applicable to the project’s current grant agreement.*

CoC Supportive Services

CoC funds can cover a wide range of supportive services to help program participants obtain and maintain housing. Some of these services overlap with the services that can be provided using the EHV services fee, so CoCs and PHAs should carefully consider how best to strategically use each program’s resources. Additionally, CoCs and PHAs should clearly document distinct activities and costs that will be covered by each source with adequate procedures to prevent duplication of benefits. Per 24 CFR 578.53, CoC funds may be used for the following costs:

- Annual assessment of service needs
- Assistance with moving costs
- Case management
- Child care
- Education services
- Employment assistance and job training
- Food
- Housing search and counseling services
- Legal services
- Life skills training
- Mental health services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Utility deposits
- Direct provision of services

Key Considerations

- CoCs and PHAs should recognize the potential for EHV to address [housing inequities driven by systemic racism](#) and work closely with people of color, Indigenous people, people with lived experience of homelessness, and other key stakeholders in developing their [strategy for prioritizing EHV and related resources](#) and [updating coordinated entry processes, including prioritization, to advance racial equity](#).
- CoCs and PHAs should consider how resources, including EHV and the services fee, can best be used to reduce barriers to housing for people from historically marginalized populations including people of color, Indigenous people, LGBTQ+ individuals, and people with disabilities.

Specific Considerations for Pairing Rental Assistance from EHV with Services from CoC PSH Programs

- PSH program recipients should consult with their HUD Field Office and carefully consider, on a project-by-project basis, if and when it may be appropriate to develop a new PSH project or consider a grant or budget amendment for an existing PSH project in order to pair EHV rental assistance with PSH services. Such decisions should factor in how the new or amended project could better serve current participants and other eligible people experiencing homelessness in the community and if it is permitted under the applicable NOFA under which the grant was originally awarded or the NOFA under which the project was most recently renewed.

- CoC funds used must provide *different* types of assistance than those being provided to a participant by any other public sources.
- Participants being served by rental assistance with an EHV and services through a PSH program must be enrolled in both projects simultaneously. For more information on capturing this information in the Homeless Management Information System (HMIS), see [Creating an EHV project in HMIS](#).
- CoC recipients and subrecipients are expected to conduct ongoing assessments of the supportive services needed by program participants and make adjustments to their project as necessary. These assessments must include the availability and coordination of services needed to ensure long-term housing stability. The CoC Program interim rule does not have a limit on the total number of months a participant may receive assistance from CoC-funded PSH, including supportive services. CoC recipients and subrecipients are expected to provide necessary supportive services to program participants even if the program participant's rent is being paid for by non-CoC funds (e.g., EHV). CoC projects should outline these processes in their written policies and procedures.
- Communities should confirm whether a CoC PSH program is [dedicated to serving only chronically homeless households or also those that meet DedicatedPLUS criteria](#), as this will impact which households are eligible to be prioritized through coordinated entry and referred for co-enrollment in both programs.

Specific Considerations for Serving Households Moving On to EHV from CoC PSH Programs

- Individuals and families identified for a ["Moving On" strategy](#) who reside in PSH and were homeless at the time of admission are eligible for EHV under Category 4 of the eligible populations for EHV as individuals or families who are recently homeless. *Note: A PSH recipient cannot determine when a program participant is "ready" to be transferred or exited from a program. If a program participant believes that they are ready and indicates that they would like to move on, recipients can work with the program participant to transition out of the project.*
- CoC PSH funds *may not* be used to provide services, including aftercare, after a household has exited the PSH program. CoC PSH funds can, however, provide case management and other supports that help current participants prepare for the transition, communicate with landlords, and, if necessary, find new housing, as long as those costs are not also covered by the EHV services fee or other federal funding.
- For more information on Moving On, see the webinars, products, and other resources available at [HUDEXchange: Moving On](#).