DedicatedPLUS in the Los Angeles Continuum of Care

Purpose
This policy establishes that the Los Angeles Continuum of Care (LA CoC) is converting all its CoC Program-funded Permanent Supportive Housing (PSH) beds, including Dedicated\(^1\) and non-Dedicated beds, to DedicatedPLUS. This allows the LA CoC to more efficiently and effectively serve persons who are chronically homeless, persons with the longest histories of homelessness, and those with the most severe service needs while also providing flexibility to house these populations as quickly as possible.

Background
On August 10, 2017, a special convening of the Los Angeles Homeless Services Authority (LAHSA) Commission approved the ‘DedicatedPLUS in the Los Angeles Continuum of Care’ policy. The DedicatedPLUS concept was introduced in the U.S. Department of Housing and Urban Development’s (HUD) Notice of Funding Availability (NOFA) for the 2017 CoC Program Competition. Due to the uncertainty around how HUD would interpret this new program in future NOFA competitions, LAHSA’s 2017 DedicatedPLUS policy limited the conversion to new PSH programs.

The goal of DedicatedPLUS is to support communities in their efforts to serve persons with the highest needs and longest histories of homelessness, including those experiencing chronic homelessness, by allowing more flexibility than is permissible under the Dedicated PSH designation in terms of who can be served.

With this goal in consideration, it has been determined that within the LA CoC, it would be most advantageous to convert the designation of all Dedicated and non-Dedicated PSH—including new and existing renewal PSH—to DedicatedPLUS. This will allow the LA CoC to continue to target the highest needs households for PSH, and will reduce recordkeeping requirements associated with

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\(^1\) As defined in the 2017 CoC Program Notice of Funding Availability, Dedicated means a “Permanent supportive housing bed that is dedicated specifically for use by chronically homeless individuals and families within a CoC’s geographic area, as reported in the CoC’s HIC and the FY 2016 permanent housing project applications. When a program participant exits the project, the bed must be filled by another chronically homeless participant unless there are no chronically homeless persons located within the CoC’s geographic area. This concept only applies to permanent supportive housing projects.”
Dedicated PSH that can lead to chronically homeless persons not meeting eligibility. Having this flexibility will result in increased housing placements as well as an overall reduction in the average length of time homeless.

**Policy**

All existing renewal and new CoC Program-funded PSH will be designated as DedicatedPLUS (see “Definition and Eligibility” section below). For renewal projects, this includes both PSH that is currently Dedicated and non-Dedicated according to the most recent grant agreement. All such PSH will be filled through the Los Angeles County Coordinated Entry System (CES) and will follow the prioritization criteria specific to CoC Program-funded PSH.

**Due Diligence and Documentation**

As with all CoC programming, receiving agencies shall make every effort to obtain third-party verification of chronic homelessness for clients being referred to DedicatedPLUS PSH. All DedicatedPLUS PSH will require documentation of disability and length of time homeless in accordance with HUD guidelines for documenting chronic homelessness. However, contrary to what is required for Dedicated PSH, the DedicatedPLUS projects will only be required to document at least four (4) months through a third-party source while the remainder of the time could be documented via self-certification and intake worker observation. The four (4) months of third-party documentation can be for any months in the most recent three-year period and do not need to be consecutive. The process for exceptions will be outlined in later procedural guidance. The eligible sources of third-party documentation of chronic homelessness will be consistent with the HUD Final Rule on Chronic Homelessness\(^2\) and the documentation of disability will have the same requirements as the CoC Program.

**Definition and Eligibility**

*DedicatedPLUS* refers to a permanent supportive housing project in which beds are allocated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth, who also meet one or more of the following criteria upon entry:

1. Experiencing chronic homelessness as defined in 24 CFR 578.3;
2. Residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. Residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3 had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;

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4. Residing in transitional housing funded by a Joint Transitional Housing and Permanent Housing-Rapid Re-Housing component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;

5. Residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or

6. Receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.