



Program Participants' Eligibility to Move from Permanent Supporting Housing (PSH) / Rapid Re-Housing (RRH) To Transitional Housing (TH)

This document provides information and examples of how program participants currently receiving assistance through a permanent supportive housing (PSH) or rapid re-housing (RRH) project, may be eligible for CoC funded transitional housing (TH) projects. There is also an overview of HUD's definition of homelessness, how it affects eligibility for TH, and the documentation that HUD requires for the Category 2 definition of homeless found at 24 CFR 578.3.

There are certain circumstances where program participants in existing CoC Program funded permanent housing programs (including PSH and RRH) are eligible to transition into CoC Program funded TH projects. These include:

1. Where program participants meet the criteria of paragraph (2) of the definition of homeless at 24 CFR 578.3 (Category 2) at intake for TH. This means that the program participant will imminently lose their permanent housing, and they have not identified a subsequent residence, and they lack the resources and support networks to obtain other permanent housing. In that instance, program participants may be eligible to move from their PSH or RRH project to a TH project.
2. Where program participants meet the criteria of paragraph (4) of the definition of homeless at 24 CFR 578.3 (Category 4) at intake for TH. This means that the program participant is experiencing trauma or violence related to, or fleeing or attempting to flee, domestic violence, sexual assault, stalking or other dangerous, traumatic, or life-threatening conditions related to the violence in their current housing. The program participant must also have no other safe residence and lack the resources and support networks to obtain other safe permanent housing. In that instance, program participants may be eligible to move from their PSH or RRH project to a TH project.

SUMMARY OF HUD CATEGORIES OF HOMELESSNESS

<u>CATEGORY 1</u> Literal Homelessness (Paragraph 1 – 24 CFR 578.3) Includes individuals and families who live in a place not meant for human habitation (including the streets or in their car), emergency shelter, transitional housing, and hotels paid for by a government or charitable organization.	<u>CATEGORY 2</u> Imminent Risk of Homelessness (Paragraph 2 -24 CFR 578.3) Individuals or families who will lose their primary nighttime residence within 14 days, have no subsequent residence identified, and have no other resources or support networks to obtain other permanent housing.
<u>CATEGORY 3</u> Homeless Under Other Statutes (Paragraph 3 -24 CFR 578.3) Includes unaccompanied youth under 25 years of age, or families with children and youth, who do not meet any of the other categories but are homeless under other federal statutes, have not had a lease and have moved 2 or more times in the past 60 days and are likely to remain unstable because of special needs or multiple barriers to employment.	<u>CATEGORY 4</u> Fleeing Domestic Violence (Paragraph 4 – 24 CFR 578.3) Includes individuals or families who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and who lack resources and support networks to obtain other permanent housing.

MOVING PROGRAM PARTICIPANTS FROM PERMANENT SUPPORTING HOUSING (PSH) / RAPID RE-HOUSING (RRH) TO TRANSITIONAL HOUSING (TH)

Following are several hypothetical examples that illustrate how program participants may be eligible at intake to move from PSH/RRH to TH. These examples assume that the individuals have been referred by their coordinated entry system to the TH.

1. Sandy is a survivor of DV and resides in an RRH DV Bonus program unit. Her lease and assistance end on April 30, 2026. The RRH DV Bonus program notified her that the project will transition to a TH program on May 1, 2026. On May 1, 2026, at intake for the new DV Bonus TH program, the recipient documents that Sandy is fleeing or attempting to flee domestic violence, does not have other residences, and does not have the resources or support networks needed to obtain other permanent housing. Based on these circumstances, Sandy is eligible to become a program participant in the new DV Bonus TH program under the Category (4) definition of homeless.
2. Joe resides in a project-based PSH unit. The PSH program informed him that the project will be transitioned to a TH program on August 1, 2026. Joe's lease terminates on July 31, 2026, and he will not be allowed to remain in the PSH unit after that date, but he may be eligible for TH. Joe applies to the new TH program in advance, on July 20, 2026, less than 14 days from the date that he will lose his residence. On July 31, 2026, at intake for the TH program, the recipient documents that Joe's primary nighttime residence would be lost at the end of the day, that he had not identified a subsequent residence, and that although Joe recently got a new job, he doesn't have the resources or support network yet to obtain other permanent housing. Joe is eligible to become a program participant in the new, transitioned TH program under the Category (2) definition of homeless. One year later, Joe has saved up enough to move into his own, unsubsidized apartment.
3. Danny was residing in a PSH program unit funded by the CoC program. His landlord is Smith Properties, and his lease expires December 31, 2025. The CoC recipient notified Danny and Smith Properties that they terminated their PSH program on October 31, 2025. Since no rent was paid in November, Danny received a notice to leave on November 17, 2025, requiring him to move out on December 1, 2025. The local CoC has a TH program a few blocks from Danny's current housing, and he applies for assistance through the TH program on November 17, 2025, the day he receives his notice to quit. On December 1, 2025, at intake for the TH program, the recipient documents the notice to quit, requiring Danny to leave his residence within 14 days of this application for assistance, and documents that Danny has not identified a subsequent residence and does not have the resources or support networks needed to obtain other permanent housing. Danny is eligible to become a program participant in the TH program under the Category (2) definition of homelessness.
4. Kate and her children were residing in a PSH program funded by the CoC program. Kate's lease expires in less than two weeks, she has not identified any subsequent residence, and she does not have the resources or support network to obtain other permanent housing. Kate's family applies for assistance through TH programs in her CoC. At intake, the TH programs should be able to demonstrate that Kate's family is eligible under the Category (2) definition of homelessness.

KEEPING RECORDS OF ELIGIBILITY

When qualifying an individual or family as imminently homeless under paragraph (2) of the definition of homeless at 24 CFR 578.3, the recordkeeping requirements at 24 CFR 578.500(b)(3) apply.

FOLLOWING STATE AND LOCAL LANDLORD-TENANT LAW

CoC recipients that have a landlord-tenant relationship with program participants must follow state and local landlord-tenant laws.

MOVING FROM ONE PERMANENT HOUSING PROJECT TO ANOTHER PERMANENT HOUSING PROJECT

The guidance above is intended to address specific questions HUD has received about program participants' eligibility to move from Permanent Housing to Transitional Housing. Nothing in this guidance is meant to replace guidance HUD has previously issued about eligibility to move from one Permanent Housing project to another Permanent Housing project. In the examples above, individuals and families who meet the definition of homeless may be eligible for other homeless assistance and are not necessarily limited to Transitional Housing.