

Project Eligibility & Low Barrier Expectations: Continuum of Care & Youth Homelessness Demonstration Program Projects

The June 1, 2022 “Applying for Continuum of Care or Youth Homelessness Demonstration Program Funding: What to Expect” webinar briefly discussed the expectations that CoC and YHDP projects operate in a low barrier manner with minimal eligibility requirements. This document provides more detail to what this means in practice. A recording of that webinar may be found [here on HAND’s website](#).

Project Eligibility

- HUD’s regulations establish very basic eligibility requirements for CoC projects.
- The Detroit CoC expects providers to not establish any additional eligibility requirements for their projects, although they may target specific populations in their projects.
 - Eligibility requirements set by other funders of the project are allowable.
- For our purposes, eligibility means that without this characteristic, a person/household cannot be served by the CoC project, while target population means a population group a project is specifically proposing to serve (ie, youth or people fleeing domestic violence)
- Example:
 - Eligibility for PSH projects: Person must have a disability and be staying in an emergency shelter or be unsheltered
 - Target Population: A PSH program that will serve youth between the ages of 18 – 24.
 - How this works with Coordinated Entry (CE):
 - The Youth PSH project reports to CE they have a vacancy and need a referral.
 - CE staff have already assessed and determined people who meet the eligibility for PSH
 - Of these individuals, CE staff identify people who fit within the Youth PSH’s target population (ages 18-24), and out of that population, and in accordance with our PSH prioritization factors, refer to the Youth PSH program

Being Low Barrier

At its core, being “low barrier” means that the project does not impose upon the project, or the people it is service, obstacles to being served by the project. The following are situations that have arisen in the past with CoC funded programming. The following are not HUD eligibility requirements and therefore cannot be applied to the project (unless the project has other funding requiring these):

- **Income:** A person can have as much (or as little) income and be eligible for the project.
- **Criminal history:** While landlords may deny renting to a person due to criminal history, a person is still eligible for the CoC project regardless of that history. *It is the obligation of the service provider to find housing that will accept a person with a criminal history.*
 - Criminal Sexual Conduct (CSC) history: Project-based projects may deny persons with a CSC history if the project is located within certain distance of school/childcare center/etc.
 - The CoC recognizes the challenges of housing people with a criminal history.
- **Possession of personal ID/Social Security card/birth certificate:** If a person does not have these items, providers are expected to help them obtain them; but lack of documentation in and of itself is not a reason to deny a person for a CoC project.
- **Ability to get utilities in their own name:** The CoC recognizes some people may be challenged to get utilities in their own name, and that landlords may not include utilities in the rent. However, the inability for a person to get utilities on in their own name is not a reason to deny a person services.
- **Citizenship/Legal Status:** A person’s status as a US citizen or any other legal status is not an eligibility criterion.
- **Gender Identity:** Providers must provide services based on the gender the person identifies as. HUD’s Equal Access Rule provides details on these expectations.