

Guidance for Project Inclusion in the Greater Richmond Continuum of Care Point-in-time count

Overview: The purpose of this policy briefing is to document the criteria for homeless assistance programs to be included in the regional point-in-time count for the Greater Richmond Continuum of Care (GRCoC). This policy briefing does not cover the point-in-time survey, eligibility for public funding coordinated through the GRCoC, or competitiveness for such public funding. Please see <https://www.homewardva.org/point-in-time-count> and <https://www.endhomelessnessrva.org/funding> for more information on these topics.

Point-in-time count: The point-in-time count is a single day count where homeless services staff and trained volunteers talk with people in our community who are staying in shelters or sleeping outside. This is our opportunity to hear directly from the people most impacted by the crisis of homelessness, to learn more about their situation, and to understand their needs. The PIT count is conducted regionally across the City of Richmond and the counties of Chesterfield, Henrico, Hanover (including Ashland), New Kent, Charles City, Goochland, and Powhatan. The data is submitted in the U.S. Department of Housing and Urban Development and is included in an [annual report on homelessness reviewed by Congress](#) during budget appropriations.

This single day count provides a snapshot of changes and trends over time related to individuals and families experiencing homelessness in our region. PIT data are based on the actual numbers of people counted by experienced and trained volunteers. The PIT count is not intended to provide a comprehensive overview of all instances and episodes of housing instability and homelessness in a community and does not capture the number of people who might be eligible for or in need of housing assistance or supportive services.

Regulatory framework for PIT Count: The January count is required by the U.S. Department of Housing and Urban Development (HUD) in order to enable our community and our agency partners to apply for funding targeted to address homelessness. The winter count is coordinated across the state to get a sense of the scale of this crisis across the Commonwealth. State funding through the Virginia Homeless Solutions Program funding also requires agencies to participate in their community's point-in-time count to be eligible for funding.

The [methodology used to conduct the PIT count is approved](#) annually by the Greater Richmond Continuum of Care (GRCoC) board and is submitted to HUD as part of the annual funding competition. Homeward, as the [designated Collaborative Applicant for the GRCoC](#), plans and coordinates the PIT count twice a year, in January and July. Information from the point-in-time count is used to complete and submit the [HUD Housing Inventory Chart](#).

Regulatory guidance for the point-in-time count can be found here:
<https://www.hudexchange.info/programs/hdx/pit-hic/#2024-pit-count-and-hic-guidance-and-training>.

Definition of Homelessness: There are many definitions of homelessness and each of these represents real needs in our community as part of larger crises related to economic inequality and a lack of affordable housing. Nationally, the point-in-time count is based on the HUD definition of homelessness as defined in the [HEARTH Act of 2009](#): https://www.hud.gov/sites/documents/HAAA_HEARTH.PDF. This federal definition of homelessness does not include those who are poorly or unstably housed including those staying with family or friends or living in hotels or motels (with limited exceptions outlined below).

HUD has communicated this interpretation and determined that “[t]his longstanding interpretation has helped target HUD’s limited homeless resources to those most in need of them, while directing other people, like those who are poorly housed, to other HUD housing programs.”

(<https://www.govinfo.gov/content/pkg/FR-2011-12-05/pdf/2011-30942.pdf>)

Relevant to the PIT Count, HUD defines homelessness as including people staying in area shelters, such as **emergency shelter**, **Safe Havens**, and **transitional housing**; and **unsheltered** individuals staying outdoors or in a place not meant for human habitation.

Unsheltered Homelessness: For the purposes of the point-in-time count and other GRCoC planning and programmatic activities, “unsheltered homelessness” is defined as people staying in a place not meant for human habitation. In the Greater Richmond region served by the GRCoC, this includes individuals and/or families sleeping in cars, in wooded areas, outside of buildings, in tents (single or as part of an encampment), and, less frequently, in non-functional campers and similar vehicles. Individuals sleeping in a car or vehicle who report that they have housing but are temporarily staying in the vehicle due to a family conflict, inebriation, travel, or other transient situations are not included in the PIT count.

Unsheltered individuals are counted during the PIT Count through street outreach that occurs early in the morning after the night of the count. This outreach is conducted in Richmond, Henrico County, and Chesterfield County. Staff verbally administer surveys to unsheltered clients who agree to take the survey. In 2024, additional coordination of survey times and locations will take place among outreach providers so that if people do not want to take the survey, they can be counted. For the further outlying counties in the CoC (Hanover, Goochland, Powhatan, Charles City, and New Kent counties), phone calls are also placed to Departments of Social Services to determine whether they are currently aware of any people experiencing homelessness within their counties who should be included in the PIT count.

HUD’s [Final 2024 HIC and PIT Data Collection Notice](#) for additional details.

Emergency Shelter including sexual and domestic violence shelters: Households (individuals and/ or families with minor children) are counted as sheltered in the PIT count if they are staying in an emergency shelter on the night of the PIT count.

Emergency shelters are defined in federal regulations (24 CFR 576.2) as “any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.” This definition includes shelters serving people currently experiencing homelessness because they are fleeing domestic violence, dating violence, sexual assault, or stalking. To be included in the GRCoC PIT Count, an emergency shelter program must meet the following criteria:

- 1) The purpose of the program must be to serve people who meet the above referenced definition of homelessness prior to entry into the program. A shelter can serve a specific subpopulation of persons experiencing homelessness (such as survivors of domestic violence or youth and young adults.)
- 2) The program must not require a lease or occupancy agreement. Occupancy agreements are similar to rental leases and conform to applicable Virginia law and do not encompass programmatic shelter guidelines for program participants.

- 3) The shelter must be included in the [Housing Inventory Chart submitted to HUD by Homeward](#) in its role as Collaborative Applicant.
- 4) The shelter must coordinate its participation in the GRCoC Point-in-time count with Homeward.

Please note that these requirements define whether individuals and/or households with minor children staying in a shelter program are included in the sheltered portion of the GRCoC Point-in-time count (and subsequently, the Housing Inventory Chart.) In order to be eligible and competitive for the limited public funding for emergency shelter programs, there are additional program, policy, and coordination requirements. Please see <https://www.endhomelessnessva.org/funding> for more information.

Hotels and Motels Used as Emergency Shelters: The HEARTH Act definition of homelessness includes the persons residing in hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations. In our community and in many other communities without a sufficient and accessible inventory of housing units and options for persons with low or extremely low incomes, hotels are often used in lieu of other accommodation types for a number of programs such as disaster relief, respite care, refugee resettlement, and other purposes. In order to clarify when a hotel program would be included in the Greater Richmond Continuum of Care Point-in-time count, the public or charitable community organization must meet the following criteria:

- 1) The purpose of the hotel/ motel program must be to serve people who meet the above referenced definition of homelessness prior to entry into the program. A program can serve a specific subpopulation of persons experiencing homelessness (such as survivors of domestic violence or youth and young adults.)
- 2) The program must not require a lease or occupancy agreement. Occupancy agreements are similar to rental leases and conform to applicable Virginia law and do not encompass programmatic guidelines for program participants.
- 3) The program must be included in the [Housing Inventory Chart submitted to HUD by Homeward](#) in its role as Collaborative Applicant.
- 4) The program must coordinate its participation in the GRCoC Point-in-time count with Homeward.

Again, as with emergency shelters in general, there are additional program, policy, and coordination requirements for programs to be eligible or competitive for funding coordinated through the GRCoC.

Transitional housing: Under HUD regulations, individuals or families staying in a transitional housing program are counted as sheltered in the PIT Count. Additionally, persons enrolled in the Transitional Housing project of a [HUD-funded joint TH/RRH grant](#) would be counted as sheltered persons experiencing homelessness, if they are being served and do not yet have a rapid re-housing move-in date recorded.

Transitional housing is defined in section 401 of the McKinney-Vento Act, as follows: “The term ‘transitional housing’ means housing, the purpose of which is to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months or such longer period as the Secretary determines necessary.” The definition has been expanded to distinguish this type of housing from emergency shelter. This distinction is necessitated by the McKinney-Vento Act’s explicit distinction between what activities can or cannot be funded under the Continuum of Care program. The regulatory definition clarifies that, to be transitional housing, program participants must have signed a

lease or occupancy agreement that is for a term of at least one month and that ends in 24 months and cannot be extended. In the Greater Richmond Continuum of Care, transitional housing programs are primarily designed to serve specific subpopulations such as veterans experiencing homelessness, youth and young adults experiencing homelessness, and survivors of domestic violence. In order to be included in the GRCoC's PIT count, the transitional housing program must meet the following criteria:

- 1) The purpose of the transitional housing program must be to serve people who meet the above referenced definition of homelessness prior to entry into the program. A program can serve a specific subpopulation of persons experiencing homelessness (such as survivors of domestic violence or youth and young adults.)
- 2) The program must be included in the [Housing Inventory Chart submitted to HUD by Homeward](#) in its role as Collaborative Applicant.
- 3) The program must coordinate its participation in the GRCoC Point-in-time count with Homeward.

Safe Havens: A Safe Haven is a specialized transitional housing program model that is used to serve specific populations including veterans. With the implementation of the HEARTH Act, this program model is no longer supported through the HUD Continuum of Care program. To be included in the GRCoC PIT count, Safe Haven programs would need to fulfill the same criteria as transitional housing programs.

This guidance may be updated as needed based on changes to federal regulations or other information. For questions about this policy briefing, please email info@homewardva.org.