



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

October 18, 2018

Mr. Michael McConnell
PO Box 927366
San Diego, CA 92192

Dear Mr. McConnell:

Thank you for your letter of May 23, 2018, regarding the CA-601 - San Diego City and County Continuum of Care (CoC) (the San Diego CoC) 2018 Point-in-Time (PIT) count submission. Specifically, you requested that HUD not certify the San Diego CoC's PIT count submission due to the exclusion of data on persons in recreational vehicles (RVs).

Point-in-Time Count Background

The PIT counts offer a snapshot of homelessness of both sheltered and unsheltered homeless populations on a single night. The 1-night counts are conducted by CoCs in late January and reported to HUD as part of their annual applications for CoC funding. In addition to the total counts of homelessness, the PIT counts provide an estimate of the number of persons experiencing homelessness within subpopulations, such as chronic and veteran homelessness. While the CoC Program interim rule only requires CoCs to conduct PIT counts every other year, the majority of CoCs conduct both a sheltered and unsheltered PIT count every year. HUD has established standards for conducting the PIT counts, and CoCs use a variety of approved methods to conduct the counts.

When CoCs submit their data to HUD each year, HUD works with its technical assistance providers to review the data for accuracy and quality prior to finalizing the PIT estimates. HUD follows up with communities regarding errors or anomalies in the data. CoCs are required to provide corrections or explanations for each of the issues HUD identifies. When this data clean-up process is complete, HUD considers the data final and uses the data for its annual CoC Program Competition, report to Congress, and other purposes that arise.

Counting People in RVs During the PIT Count

In HUD's PIT Count Methodology Guide, HUD establishes several standards CoCs must adhere to when conducting their PIT counts. Standard 11 states:

"CoCs must be able to verify that unsheltered homeless people identified in the count are unsheltered on the night designated for the count as defined at 24 CFR 578.3 of the Homeless Definition Rule: 'An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping

accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.”

Because RVs are “ordinarily used as a regular sleeping accommodation” HUD does not believe that all persons sleeping in RVs should be included in the PIT count. However, there are several factors that a CoC can consider when determining whether to include occupants of RVs in their unsheltered PIT count data, including:

- the RV is in disrepair (e.g., holes, broken windows, flat tires, removed or broken siding);
- the RV occupants do not have access to sewer, water, and electricity connections; and
- the RV is parked in an unusual place, including non-RV designated lots, non-residential areas, or areas where RVs are not allowed to park, and the RV is clearly occupied.

CoCs must exercise discretion when counting persons in RVs because the inclusion of RVs often involves understanding the specific circumstance for RVs to determine if their occupants should be counted as unsheltered.

If a CoC chooses to count RV occupants, they must either talk to all RV occupants on the night of the PIT count to verify their housing situation or talk to enough RV occupants in the CoC on the night of the PIT count to derive a reliable sample. If a CoC chooses to use a sample approach they must consider several factors:

- How do you create a reliable sample size? This requires a consistent approach to counting RV occupants. Ideally, the CoC would create a list of criteria (like the list above) for determining which RVs they might include. Then the CoC would require the PIT count teams to conduct a random sample. HUD recommends requiring PIT count teams to engage the RV occupants in every third RV.;
- Does the CoC need to create different samples for RV occupants in different kinds of areas in the CoC? If RV occupants appear to have different numbers and characteristics in cities as opposed to more rural areas, the CoC should consider creating a sample for cities different than rural areas;and
- How will the CoC need to adjust to remove RV occupants that are not homeless? If the CoC learns that people in RVs that meet the CoC’s standard for including in the PIT count include people who are not actually homeless, then it must adjust its overall sample to remove these people. It is not unusual to find that not all people in the types of RVs we might think are housing people who are homeless are actually homeless. If the CoC finds that a certain number of people in the sample are not homeless they should adjust their total sample. For example, if 1 in 10 RV occupants were found not to be homeless, then the CoC should assume that 10 percent of all RV occupants counted are not homeless – and should remove them from the PIT count.

San Diego’s Decision to Remove RV Occupants from its 2018 PIT Count

HUD followed up with the San Diego CoC to determine why it excluded RV occupants from its 2018 PIT count. The San Diego CoC indicated they excluded RV occupants from the 2018

PIT count because the data collection did not meet HUD's PIT count methodology standards. Specifically, the San Diego CoC stated the PIT count participants were instructed not to talk to RV occupants. Thus, the CoC did not verify that persons in RVs were actually homeless and did not develop enough information about RV occupants to determine how many should be included in the PIT count.

HUD's Position on the San Diego CoC's Decision to Remove Data on RV Occupants from the 2018 PIT Count

Based on the fact that the San Diego CoC did not count all RV occupants nor did it count enough RV occupants to derive a reliable sample, HUD agrees the San Diego CoC should not include RV occupants in its 2018 PIT count. HUD would obviously prefer that the CoC conduct an accurate count of people in RVs who meet the guidance noted above, and the CoC indicated it would consider how to count RV occupants in the PIT count in the future to meet HUD's counting standard. If the CoC implements a reliable method for counting RV occupants, consistent with the guidance stated above, HUD will allow the San Diego CoC to include RV occupants in the PIT count data it reports to HUD in the future. HUD has spoken with members of the San Diego CoC and agreed to assist with any methodology questions that arise.

HUD is committed to collecting the most accurate PIT count data possible to enable us to better end homelessness. Thank you for your interest in ending homelessness.

Sincerely,

A handwritten signature in black ink, appearing to read 'Norm Suchar', with a long horizontal flourish extending to the right.

Norm Suchar
Director
Office of Special Needs Assistance Programs