



Are there income limits for individuals entering or already enrolled in a CoC-funded project?

- **The CoC Program does *not* have any requirements associated with program participant income for determining eligibility for the CoC Program.** In general, the presence of assets or other financial resources in an individual's or household's name does not necessarily preclude a household from being served in HUD's Homelessness Assistance Programs if they would otherwise meet eligibility criteria.
- **Income is calculated strictly to determine the tenant's rent or occupancy charge, not to determine eligibility.** Section 578.77(b)(2) of CoC Program interim rule states that recipients or subrecipients must examine a program participant's income initially, and at least annually thereafter, to determine the amount of the contribution toward rent payable by the program participant.
- **In the instances where a program participant's income makes the tenant rent contribution more than the rent for the unit, the tenant would not be required to move, but would instead be responsible for paying the entire contract rent.** The situation when the tenant rent contribution is more than the rent for the unit is sometimes referred to as \$0 housing payment.

PSH Considerations:

As a reminder, under the CoC Program, recipients are expected to provide supportive services for program participants that meet the needs of program participants and assist them with remaining in permanent housing, increasing their incomes, and living independently (§ 578.37(1)). Furthermore, recipients are expected to conduct ongoing assessments of the supportive services needed by the program participants, along with the availability of the services needed, and the coordination of such services needed to ensure long-term housing stability and must make adjustments to their project, as necessary (§ 578.75(e)). Note that CoC Program funds can be used to provide supportive services, as allowed under the grant's program component type, even if the program participant's rent contribution is able to fully cover the contract rent amount.

Finally, HUD understands that most communities face a gap between need and availability based on limited resources. **To the extent there are individuals in PSH who no longer need a high level of services, agencies should pursue "move on" strategies (such as MHA mainstream vouchers) that help those individuals shift to another form of housing assistance,** which would in turn free up the PSH assistance for another prioritized household.

Note: While these guidelines reflect CoC Program regulations, agency-owned or site-based properties may have income limits due to other construction or rehabilitation funding sources. If this is the case, agency's internal policies should clearly specify these limits and entry criteria.