



# HOME-ARP Qualifying Populations

CoC/ESG Eligible Participants Comparison

January 2023

# Comparison of HOME-ARP qualifying populations vs. CoC/ESG eligible participants

## Purpose

This document compares the HOME-ARP qualifying populations (QPs) and the eligible participants for the Emergency Solutions Grant (ESG) and Continuum of Care (CoC) programs. Participating Jurisdictions (PJs) may choose to use HOME-ARP funds to further their existing efforts to reduce and prevent homelessness. It is important that PJs understand the differences between the populations currently served by homeless service providers and populations that qualify as HOME-ARP QPs. In addition, HOME-ARP permits the use of the CoC's Coordinated Entry (CE) system(s) as a referral method if certain conditions are met. PJs should understand how the populations covered by the standard CE system differ from HOME-ARP QPs before making decisions about referral methods, including whether and how to expand CE for HOME-ARP projects and activities. For more information on HOME-ARP referral methods, please see [Understanding HOME-ARP Preferences, Referral Methods, and Allocation Plan Requirements](#), [Using HOME-ARP Referral Methods](#), and [Introduction to HOME-ARP Referral Methods and Coordinated Entry](#) on the [HUD Exchange](#).

## HOME-ARP Qualifying Populations

1. Homeless—as defined in [24 CFR 91.5](#) *Homeless* (1), (2), (3)
2. At risk of homelessness—as defined in [24 CFR 91.5](#) *At risk of homelessness*
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking—as defined by the U.S. Department of Housing and Urban Development (HUD)
4. Other Populations—those who do not qualify under the other three QP definitions but meet one of the Other Populations criteria identified in Section IV of the [HOME-ARP Notice](#).

## ESG and CoC Eligible Participants

1. Persons experiencing homelessness—as defined in [24 CFR 578.3](#) and [576.2](#)
2. Persons at risk of homelessness—as defined in [24 CFR 578.3](#) and [576.2](#)

**The populations served by ESG and CoC programs are a subset of the HOME-ARP QPs.**



## Comparison of HOME-ARP qualifying populations vs. CoC/ESG eligible participants

HOME-ARP QPs	CoC/ESG eligible participants	Comparison
Homeless, as defined in <a href="#">24 CFR 91.5</a> <i>Homeless</i> (1), (2), or (3), which aligns with the CoC/ESG definition with one exception.	Homeless, as defined in <a href="#">24 CFR 578.3</a> and <a href="#">576.2</a> .	HOME-ARP QPs and CoC/ESG program participants share many attributes, with one exception: Category 4 as defined in <a href="#">24 CFR 578.3</a> and <a href="#">576.2</a> , <i>people fleeing or attempting to flee domestic violence</i> , is not included in the HOME-ARP QP homeless definition. More information below.
At risk of homelessness, as defined in <a href="#">24 CFR 91.5</a> , which aligns with the CoC/ESG definition.	At risk of homelessness, as defined in <a href="#">24 CFR 578.3</a> and <a href="#">576.2</a> .	No differences. These programs serve the same populations at risk of homelessness.
Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in <a href="#">24 CFR 5.2003</a> and Trafficking Victims Protection Act of 2000 (TVPA), as amended ( <a href="#">22 U.S.C. 7102</a> ).	Homeless, category 4 as defined in <a href="#">24 CFR 578.3</a> : Any individual or family who: (i) is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing.	<p>The definition of HOME-ARP QP is broader than the CoC/ESG definition of eligible participants.</p> <p>The HOME-ARP QP includes <i>persons fleeing or attempting to flee human trafficking</i>, which includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000, as amended (<a href="#">22 USC 7102</a>).</p> <p>HOME-ARP eliminates the CoC/ESG requirement that an individual or family:</p> <ul style="list-style-type: none"> <li>• has no other residence; and</li> <li>• lacks resources or support networks</li> </ul> <p>PJs must consider the domestic violence/sexual assault/trafficking QP a separate population from the homeless population.</p>



## Comparison of HOME-ARP qualifying populations vs. CoC/ESG eligible participants

HOME-ARP QPs	CoC/ESG eligible participants	Comparison
<p>Other Populations: Other families, defined as households who have previously been qualified as “homeless” under <a href="#">24 CFR 91.5</a>, are currently housed due to temporary or emergency assistance, <b>and</b> who need additional housing assistance or supportive services to avoid a return to homelessness.</p>	<p>No equivalent definition.</p>	<p>Households under this HOME-ARP QP might be currently served in a homeless service program or considered homeless under the CoC/ESG definition, depending on the temporary or emergency assistance being provided.</p>
<p>Other Populations: At greatest risk of housing instability, defined as households who meet either (i) or (ii) below:</p> <ul style="list-style-type: none"> <li>i. have annual incomes less than or equal to 30% Annual Median Income (AMI) and experience severe housing cost burden (pay more than 50% of monthly income toward housing); or</li> <li>ii. have annual incomes less than or equal to 50% AMI and meet one of seven housing instability conditions from the QP definition established at <a href="#">24 CFR 91.5</a>: <i>At risk of homelessness</i>, paragraph (iii), and outlined in the <a href="#">HOME-ARP Notice</a>.</li> </ul>	<p>At risk of homelessness as defined in Notice <a href="#">CPD-20-08</a> Waivers and Alternative Requirements for the ESG Program Under the CARES Act.</p> <p><a href="#">CPD-20-08 temporarily</a><sup>1</sup> expanded the income limit in the definition of <i>at risk of homelessness</i>, as defined in <a href="#">24 CFR 576.2</a>, paragraph (1)(i), to 50% AMI for ESG-CV and annual ESG funds used to prevent, prepare for, and respond to coronavirus.</p> <p>Persons must also lack sufficient resources or support networks to prevent them from moving to an emergency shelter or another place described under the “homeless” definition in accordance with <a href="#">24 CFR 576.2 (ii)</a> AND must meet one of the conditions in <a href="#">(iii)</a>.</p>	<p>At greatest risk of housing instability (i) is different than the ESG/CoC at risk of homelessness definitions which does not include the condition <i>experiencing severe cost burden</i>.</p> <p>At greatest risk of housing instability (ii) and the <a href="#">CPD-20-08 temporarily</a> expanded definition of <i>at risk of homelessness</i> serve the same populations.</p> <p>The expanded income eligibility ends on 9/30/2023 for ESG-CV funds and 6/30/2024 for reallocated ESG-CV funds as outlined in <a href="#">Notice CPD-22-06</a>.</p>

<sup>1</sup> This waiver for homeless prevention eligibility is in effect for ESG-CV funds. The expanded income eligibility ends on 9/30/2023 for ESG-CV funds and 6/30/2024 for reallocated ESG-CV funds ([Notice CPD-22-06](#)). The expanded income eligibility for annual ESG funds used to prevent, prepare for and respond to coronavirus expired on 9/30/2022.



## Comparison of HOME-ARP qualifying populations vs. CoC/ESG eligible participants

HOME-ARP QPs	CoC/ESG eligible participants	Comparison
Veterans and families that include a veteran family member that meet the definition of a QP.	Veterans experiencing homelessness.	No difference. Both programs serve veterans when that veteran or their household qualifies under the existing criteria.

### Additional Resources

This crosswalk is part of a series of documents that can be used together or separately to assist PJs in making informed decisions about HOME-ARP projects and activities in which there are ESG or CoC program funds. The two other crosswalks in this series are:

[HOME-ARP Eligible Activities: CoC/ESG Housing and Services Crosswalk](#) provides an overview of how HOME-ARP eligible activities differ from the housing and services provided through the ESG and CoC programs. Understanding these differences will allow PJs to consider whether program design changes are necessary to ensure that a project proposed by a CoC or homeless service provider will meet HOME-ARP requirements.

[Homeless Housing and Services Funding Crosswalk](#) provides an overview of common funding sources for housing and services for persons at risk of or experiencing homelessness and other special populations. This overview of existing resources will assist PJs with the review of proposed HOME-ARP projects and activities, in particular those that layer funding from multiple sources.



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