



TO: HCH Grantees
FROM: John Lozier, Executive Director
DATE: August 23, 2012
RE: Policy Advisory: Clarification of the 12 Month Rule

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In its recent Service Area Competition (SAC) guidance, HRSA clarified the definition of homelessness in response to language included in the Senate Appropriations Committee Report and confirmed in the Conference Committee Report on the FY2012 Appropriations Act. Specifically, the SAC states:

HEALTH CARE FOR THE HOMELESS APPLICANTS [must]

- Provide a plan that ensures the availability and accessibility of required primary and preventive health services to people experiencing homelessness, defined to include **residents of permanent supportive housing or other housing programs that are targeted to homeless populations**, in the service area. Such plan may also allow for continuing to provide services for up to 12 months to individuals no longer homeless as a result of becoming a resident of permanent housing. [emphasis added]

This means that, effective immediately, formerly homeless residents of PSH are eligible to receive Health Center services funded under Section 330(h) for an indefinite period. This clarification is important as HCH grantees consider initiating or expanding participation in PSH programs. PSH has been shown effective in helping vulnerable individuals maintain stable living environments and in reducing the incidence of homelessness in many communities, and is a key strategy in the Federal Strategic Plan to Prevent and End Homelessness. Note that services delivered in PSH must comply with HRSA's Scope policy.

Note that homeless clients who move into "regular" permanent housing can still be served for only 12 months with 330(h) funding.

Citation: HHS, HRSA, Bureau of Primary Health Care, Health Center Program, Fiscal Year 2013. Service Area Competition, Announcement Number HRSA-13-223, page 11. Released June 6, 2012.