

# CA-507 Marin County CoC

## How to Manage Overlapping Enrollments

### Overview

In recent years, HUD has begun to crack down on what they have deemed “[OVERLAPPING ENROLLMENTS](#).” Overlapping enrollments occur when any of the following client data points intersect at any given time:

1. **Program Start Dates:** Concern only applicable to Emergency Shelters, and Transitional Housing program types
2. **Move-in Dates:** Concern only applicable to Permanent Housing program types (PH, PSH or RRH)
3. **Program Exit Dates:** Concern applicable to Emergency Shelters, Transitional Housing and Permanent Housing project types

### Residential Projects/Residential Projects

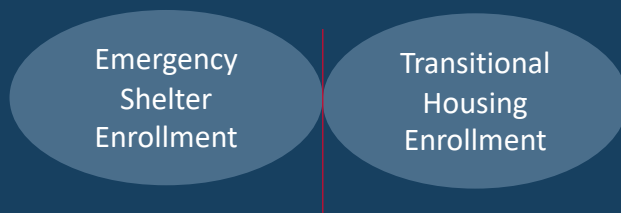
Example 1: Client transfers from an emergency shelter into transitional housing, but the shelter delays their exit from the shelter.

- **Solution:** Ensure Shelter programs are using the date the client physically left the shelter to move into transitional housing. Similarly, the Transitional Housing program should use the date the client physically moved into transitional housing as their program start date.

#### Example Issue



#### Example Solution



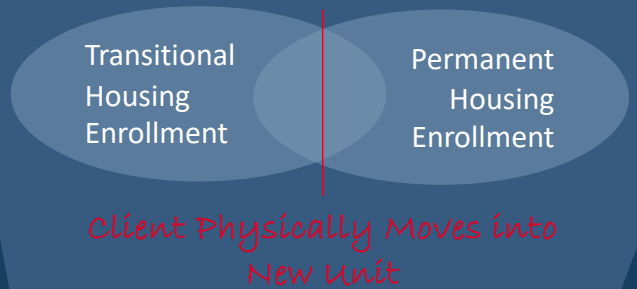
*Physical Move of Client*

## Residential Projects/Permanent Housing Projects

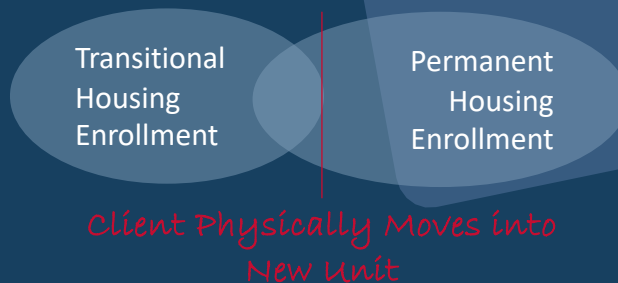
Example 2: Client is enrolled in transitional housing and a PSH program, but the PSH program enters a move-in date that is before the date the client physically moves into their PSH placement.

- **Solution:** The PSH program should use the date the client physically moved into their new home as the move-in date.

### Example Issue



### Example Solution

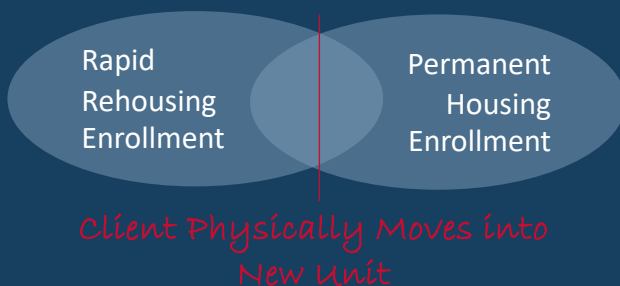


## Permanent Housing Projects/Permanent Housing Projects

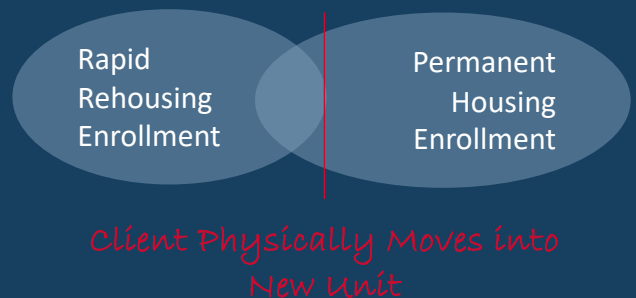
Example 3: Client is enrolled into a RRH program with a move-in date then transfers to a PSH program with a new move-in date.

- **Solution:** The RRH program should use the day before the client physically moves into their new permanent home as their program exit date. The date the client physically moved into their new permanent home would be the PSH programs move-in date.

### Example Issue



### Example Solution



## Permanent Housing Projects/Permanent Housing Projects (Move-in or Homeless Prevention Support)

Example 4: Client is enrolled in a PH program and has a move-in date entered and is subsequently or concurrently enrolled in a RRH program that is paying for either move-in costs or homeless prevention assistance which also has a move-in date.

- **Solution:** Determine the level of reporting priority for the collection of a move-in dates in your program in Marin County CoC.

**1<sup>st</sup> Reporting Priority** ESG, CoC &  
[AB977](#) Funded Programs

**2<sup>nd</sup> Reporting Priority** Local PSH  
Voucher Programs

**3<sup>rd</sup> Reporting Priority** Locally Funded  
RRH Programs

A permanent housing program that overlaps with a higher-level priority program must delete their move-in date.

Move-in dates will be kept in both permanent housing programs should the programs be of the same priority.

### What does this mean to your programs?

Your HMIS Administrators will use this guidance to steer their data quality outreach efforts.

This means there will be a continued expectation to correct overlapping enrollments when applicable. However, based on this guidance, they anticipate an overall reduction in needed overlapping enrollment data corrections.

