Guidance on Shared Rapid Re-Housing Apartments

Guidance and Implications for Sharing Units under the CoC RRH Program

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Office of Housing and Community Development

OVERVIEW

This guidance is published to provide clarity and standards for Continuum of Care (CoC) Rapid Re-Housing (RRH) projects. Information provided here specifically addresses the operation of a CoC RRH program hoping to adopt shared housing for its project participants, meaning two (2) unrelated adults in a single RRH apartment unit.

The following information is taken from a combination of statute, regulations and U.S. Department of Housing and Urban Development (HUD) official policy notices, guidance and FAQs. A Rapid Re-Housing Toolkit is also available online from the National Alliance to End Homelessness.

Overview of Shared Housing

Shared housing is an affordable living arrangement where two or more unrelated individuals share a housing unit (such as a house or apartment) rather than one household occupying a unit alone. Occupants typically have their own private bedrooms while sharing common spaces like kitchens, bathrooms, and living areas to reduce individual living costs

Under HUD's Continuum of Care (CoC) Rapid Re-Housing (RRH) program, shared housing is a Permanent Housing model used to help people experiencing homelessness exit the streets or shelters quickly. While the CoC Program interim rule is generally silent on the specific type of housing, it allows for shared housing arrangements (roommate situations) doing so requires careful attention to program design, eligibility, lease structures, and participant rights. Guidance around those considerations and requirements follows:

Core Requirements and Considerations

1. Lease Structure Is Critical

- Each project participant should have their **own lease or sublease** with the landlord or a master lease holder. This protects their housing stability independently — if one roommate exits the program, others aren't automatically displaced.
- A **master lease model** (where the CoC grantee or subgrantee holds the lease and subleases to participants) is permissible but adds administrative complexity and requires careful legal review in each jurisdiction.
- HUD requires that participants have **legal rights to occupy** the unit — *informal arrangements don't satisfy program requirements.*

2. Rent Calculation and Subsidy Limits

- RRH subsidies must meet the **rent reasonableness standard** — the participant's share of rent must be reasonable compared to comparable unassisted units.

- Fair Market Rents (FMRs) apply, but in shared housing, the **per-person share** of rent (not the whole unit's rent) is what's measured against reasonableness.
- HUD allows subrecipients to subsidize **a participant's portion** of shared housing costs, not necessarily the whole unit — this is considered a cost-efficiency advantage of the shared housing model.

3. Habitability and Unit Standards

- The **entire unit must meet HUD's inspection standards**, not just the participant's bedroom. This means common areas, kitchens, bathrooms, and all shared spaces are subject to inspection.
- As of October 1, 2026, HUD Inspection Standards known as "Housing Quality Standards (HQS)" will be transitioning to the "National Standards for the Physical Inspection of Real Estate" (NSPIRE). All units must meet the appropriate standards.
- When evaluating shared housing under HUD's CoC RRH program, inspections are broken down into **t**hree distinct inspectable areas: the Unit (the individual's private room), the Inside (the shared common areas), and the Outside (the building structure and site)
- Overcrowding standards must be met — the unit must be appropriately sized for the number of occupants.
- Shared housing is prohibited in zero-bedroom (studio) or one-bedroom units.

4. Participant Choice and Consent

- **Shared housing cannot be the only option offered.** HUD's RRH programs awarded under NOFOs prior to FY2026 emphasize Housing First principles, meaning participant choice is paramount.
- Participants must genuinely consent to shared living arrangements — coercion or presenting it as the default undermines program integrity and client dignity. With tenant-based rental assistance, it is up to the program participant to select their housing unit and the people with whom they share it.[1]
- Compatibility screening between potential roommates by the program is appropriate but cannot be used to discriminate on protected class bases (race, gender, disability, familial status, etc. under the Fair Housing Act).

5. Participant Matching and Stability

- Thoughtful **roommate matching** is operationally essential. Shared housing instability (conflict, incompatibility) is a leading cause of returns to homelessness in this model.
- Programs should have a **conflict resolution protocol** and be prepared to intervene or relocate a participant if the shared situation breaks down — without penalizing them.
- Consider matching people with compatible schedules, sobriety preferences, pet ownership, and other lifestyle factors where legally permissible.
- It is a best practice to develop a roommate contract or agreement that defines chores, visitor policies, and shared bill payments to minimize conflict.

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[1] The authority establishing that Rapid Re-housing (RRH) participants generally select their own housing unit and who they share it with is found in the **HUD Continuum of Care (CoC) Program Interim Rule**, specifically in the definitions and rental assistance regulations. The specific regulatory citations are:

- 24 CFR § 578.51(c)**:** Defines tenant-based rental assistance explicitly as "rental assistance in which program participants choose housing of an appropriate size in which to reside."
- **24 CFR § 578.51(e):** Contrasts tenant-based assistance with project-based assistance, clarifying that in tenant-based models, the participant holds the lease with the landlord and retains the assistance if they move, thereby confirming they control the housing selection.
- **24 CFR § 578.51(c)(1):** Notes that while participants choose their unit, subrecipients may impose geographic restrictions if "necessary to facilitate the coordination of supportive service

6. **Services Must Still Be Individualized**
   - Each participant in shared housing is a **separate program participant** with their own case plan, service needs, and subsidy calculation.
   - Case managers must be careful not to treat a shared household as a single unit of service — each person's housing stability plan, income goals, and exit strategy should be individualized.

7. **Privacy and Fair Housing**
   - In shared housing, gender and other identity considerations matter. Programs serving survivors of domestic violence, transgender individuals, or others with specific safety needs must be especially thoughtful.
   - Each participant is entitled to privacy in their portion of the unit — programs cannot use shared housing as a justification for invasive oversight.

8. **Duration and Transition Planning**
   - RRH is time-limited (typically up to 24 months under CoC). In shared housing, **exit timing may be staggered** — one roommate may exit the subsidy before another.
   - Programs must plan for these transitions carefully so that one person's subsidy ending doesn't destabilize another's tenancy.
   - Ideally, participants transition to **paying their full share independently** — shared housing can actually help with this since individual cost burden is lower.

Advantages of COC RRH Shared Housing

The following may present opportunities for those considering CoC RRH Shared Housing:

- **Cost efficiency**: Subsidizing a room or partial rent rather than a whole unit stretches CoC dollars further benefiting project participant and the efficacy of the program which can then serve more people.
- **Affordability post-exit**: Shared housing is more sustainable for people with very low or fixed incomes after the subsidy ends.
- **Social support**: When well-matched, roommates can provide informal mutual support — reducing isolation, which is a major risk factor for housing instability.
- **Inventory expansion**: In tight rental markets, shared housing opens up units that might otherwise be inaccessible.

Common Pitfalls to Avoid

Pitfall	Why It Matters
Informal occupancy arrangements	Violates HUD's legal occupancy requirement
Inspecting only the participant's room	Entire unit must meet HQS
Treating shared households as one case	Each person needs individualized services
Forcing shared housing on unwilling participants	Violates Housing First principles
Poor roommate matching with no follow-up	Leading cause of breakdown and return to homelessness
Ignoring staggered subsidy exits	Can destabilize the remaining tenant

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Questions relative to this guidance can be directed to the OHCD at 508.979.1500 or via email to staff: Jennifer.Clarke@newbedford-ma.gov or Jose.Maia@newbedford-ma.gov.