

The Vehicle/Structure Tally is an optional feature used to count Vehicles and Makeshift Shelters (VMS) that appear to be serving as temporary living situations for people who cannot be engaged. The guidance from the [HUD Housing Inventory Chart and Point in Time Notice](#) for how to derive these figures is copied below.

**C. Counting People in Structures that are Hard to Assess**

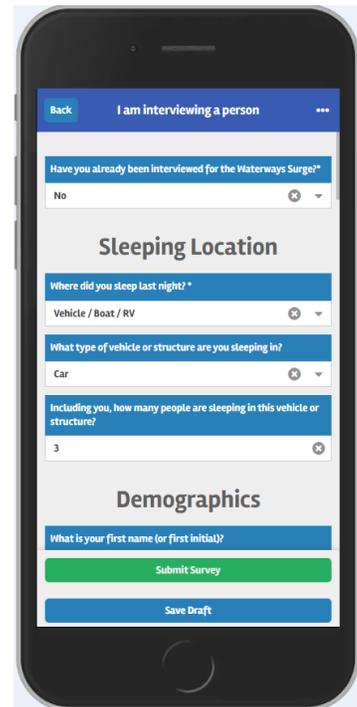
The PIT count is a count of households and people experiencing homelessness. When counting people sleeping in RVs, tents, or other locations that have low visibility, the CoC must derive an estimate based on how many people are sleeping in those situations. Do not simply count structures without having additional information about how many people are in those kinds of sleeping situations. CoCs should not apply multipliers from other CoCs to their own CoC with regard to these, or other homeless estimates. Each CoC is unique and any extrapolation applied to a CoC’s count must be based on data derived from that CoC.

In alignment with this guidance, the business rules used within the Command Center to derive estimates of people living in these situations are as follows:

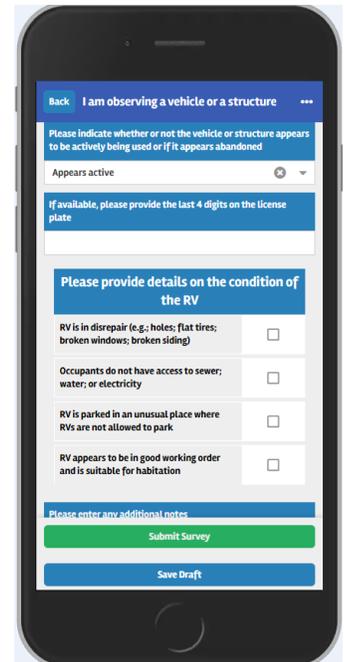
- 1) Derive an average number of people sleeping in each vehicle and makeshift shelter type. To calculate this average, the additional question of *“Including yourself, how many people are sleeping in this location?”* is asked of anyone who responds to the *“Where did you sleep during the night of the count?”* question with any living situation that is either a type of vehicle or a makeshift shelter.

For instances with three (3) or fewer people surveyed for the living situation, national averages derived from data captured from the 70+ regions that use Counting Us for their PIT counts are applied. These averages, and the sample size for each, are shown below.

Row Labels	Average of num_sleeping	Total Records
Abandoned Building	1.92	24
Boat	1.55	11
Car	1.75	1430
Makeshift Shelter	1.86	443
Other	1.92	166
RV	2.30	948
Tent	1.72	1278
Van	2.40	482
<b>Grand Total</b>	<b>1.935173568</b>	<b>4782</b>



- 2) Surveyors use the Vehicle/Makeshift Shelter Tally to count any of these living situations that are believed to contain people sleeping in them who cannot be engaged. These vehicles and structures are only included in the count estimates if the following conditions are met:
  - a. The answer to the question “Please indicate whether or not the vehicle or structure appears to be actively being used or if it appears abandoned?” is not “Appears Abandoned”.
  - b. By default, the RV is counted if...
    - a. The answer to “Please provide details on the condition of the RV?” of “RV appears to be in good working order and is suitable for habitation” is not selected. AND
    - b. Occupants do not have access to sewer, water, or electricity is selected.



The logic for determining which RVs should be counted is based on HUD’s [HUD PIT Count Methodology Guide](#). Local count administrators can run the report with or without these options included.

- 3) The averages derived in step 1 are multiplied by the counts from step 2 to derive an estimated count per vehicle and structure type.
- 4) The total estimates for each vehicle and structure type are added together, to create a total estimate for the region. For regions that opted for Geographic Sampling and Enumeration, these totals can be weighted based on whether the vehicle or structure was in a low or high-probability area designated to be canvassed, as shown in the report image below.

Vehicle/Structure Type	Avg. People per Vehicle/Structure	# Vehicles/Structures - High Prob. Areas	Est. # People - High	# Vehicles/Structures - Low Prob. Areas	Est. # People - Low
Car	1.5	522	783	25	38
RV	1.9	886	1683	22	42
Abandoned Building	1.9	4	8	0	0
Tent	1.6	248	397	2	3
Van	1.6	424	678	11	18
Makeshift Shelter	1.6	150	240	0	0
Boat	1.6	1	2	0	0
Other	1.6	88	141	6	10
Total			3932		111

HUD GUIDANCE ON DERIVING COUNT ESTIMATES FOR PEOPLE LIVING IN RVS

The previous logic for counting RVs within the Vehicle and Makeshift Shelter report was based on [HUD Guidance from the PIT Count Methodology Guide](#). Only the RVs where the answer to “Please provide details on the condition of the RV?” of “RV appears to be in good working order and is suitable for habitation” was not selected were included in the report.

In HUD’s *PIT Count Methodology Guide*, HUD establishes several standards CoCs must adhere to when conducting their PIT counts. Standard 11 states:

“CoCs must be able to verify that unsheltered homeless people identified in the count are unsheltered on the night designated for the count as defined at 24 CFR 578.3 of the Homeless Definition Rule: ‘An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.’”

Because RVs are “ordinarily used as a regular sleeping accommodation,” HUD does not believe that all persons sleeping in RVs should be included in the PIT count. However, there are several factors that a CoC can consider when determining whether to include occupants of RVs in their unsheltered PIT count data, including:

- the RV is in disrepair (e.g., holes, broken windows, flat tires, removed or broken siding);
- the RV occupants do not have access to sewer, water, and electricity connections; and
- the RV is parked in an unusual place, including non-RV designated lots, non-residential areas, or areas where RVs are not allowed to park, and the RV is clearly occupied.

CoCs must exercise discretion when counting persons in RVs because the inclusion of RVs often involves understanding the specific circumstance for RVs to determine if their occupants should be counted as unsheltered.

The [HUD HIC and PIT Notice](#) includes different guidance where any RV that isn’t in a mobile home park or campus that isn’t connected to water, sewer, or utilities should be counted as unsheltered. There is no language about the condition of the RV.

**(b) Recreational vehicles (RVs):** RVs, including camper vans, are ordinarily used as a regular sleeping accommodation, so not all persons living in RVs qualify as homeless under the McKinney-Vento Act definition. However, people experiencing homelessness that live in RVs must be counted as:

- i. sheltered if the RV
  - 1) is located in a mobile home park or campus that advertises itself as providing temporary stays and
  - 2) the RV is regularly connected to water, sewer and utilities or a septic system, well and generator, or the park or campus provide toilets, showers, and communal food preparation or food service areas; or
- ii. unsheltered if the RV does not meet the criteria in i. for people experiencing homelessness that are sheltered in RVs.

To get clarification on the business rules, Simtech submitted an email to [HICPITCount@HUD.gov](mailto:HICPITCount@HUD.gov). William Snow responded on February 10, 2025 with the following:

“The language in the Notice sets a bare minimum standard that should definitely establish what would not count as sheltered. The concept of regular access to sewage, water, and electricity is important. This may mean the RV is staying in a designated RV park or that it can go to a site regularly. If it cannot then it definitely would fall into the unsheltered category. This is where the PIT Count Methodology Guide provides guidance on factors to consider. This is different than the Notice because the Notice is setting a minimum. But the PIT Count Methodology Guide gives you additional factors that help you get to the answer of unsheltered or not. It is rare for an RV to be an emergency shelter style park but the Notice helps you see that quickly. If they are not in that situation they are either considered unsheltered or housed. And the Notice helps you see that if they are NOT able to regularly connect to sewage, water, and electricity then unsheltered is correct.”