

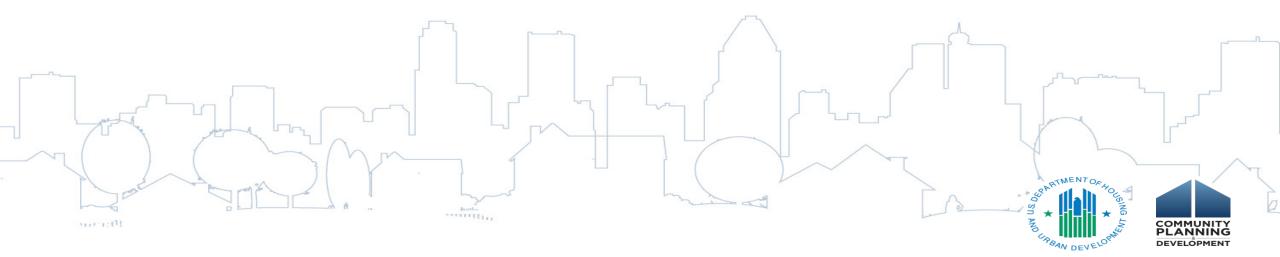
## Office Hours: COVID-19 Planning and Response



### Reminders

- A recording of today's session, along with the slide deck and a copy of the Chat and Q&A content will be posted to the HUD Exchange within 2-3 business days
- Event information for upcoming Office Hours, along with copies of all materials can be found here:

https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-webinars-and-office-hours

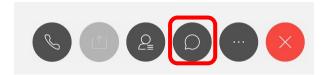


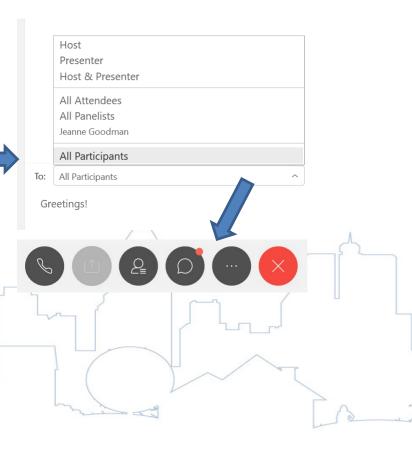
### **Chat Feature**

Select the Chat icon to make a comment or ask a question.



An orange dot on the Chat icon indicates that you have unread messages.





#### **Panelists**

#### Department of Housing and Urban Development

- Norm Suchar, Director, Office of Special Needs Assistance Programs (SNAPS)
- Aaron Weaver, Sr. CPD Representative, Chicago
- Marlisa Grogan, Senior Program Specialist, SNAPS
- William Snow, Senior Program Specialist, SNAPS

#### Centers for Disease Control and Prevention

• Emily Mosites, PhD MPH- COVID-19 At-Risk Population Task Force, Senior Advisor on Health and Homelessness

#### Department of Veterans Affairs

- Jeffery Quarles, MRC, LICDC, National Director, Grant and Per Diem Program
- John Kuhn, LCSW, MPH; National Director, Supportive Services for Veteran Families



## Agenda

- Updates
  - Centers for Disease Control and Prevention
  - Dept of Housing and Urban Development
    - Eviction Moratorium
    - Highlights on Mega Waiver Webinar
    - Communication strategies
  - Dept of Veterans Affairs
- Q&A

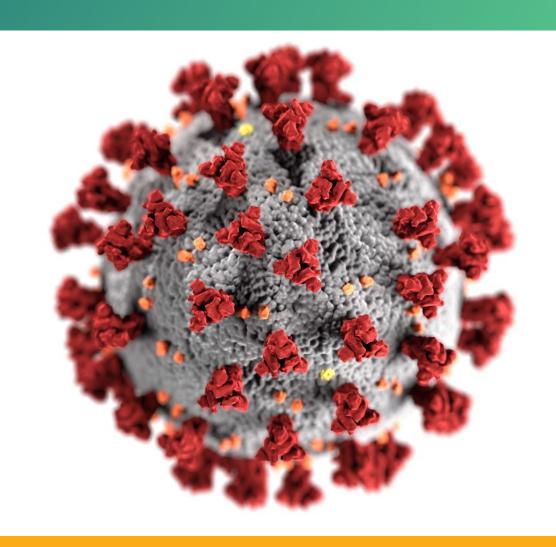




Emily Mosites, PhD MPH
At Risk Population Task Force
COVID-19 Response
Centers for Disease Control and Prevention

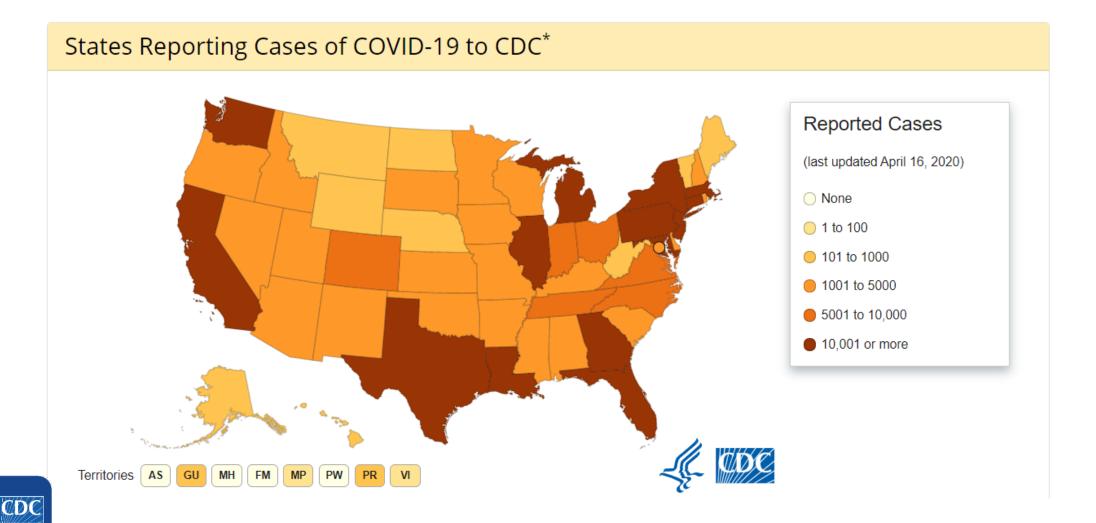
**COVID-19 and Homelessness** 





For more information: www.cdc.gov/COVID19

### Over 630,000 cases reported in the United States



#### CDC guidance related to homelessness

Under "Schools, workplaces, and community locations"

#### Interim Guidance for Homeless Service Providers

Plan, Prepare and Respond to Coronavirus Disease 2019 (COVID-19)

This interim guidance is based on what is currently known <u>about Coronavirus Disease 2019 (COVID-19)</u>. The Centers for Disease Control and Prevention (CDC) will update this interim guidance as needed and as additional information becomes available.

#### In this guidance

- Before a COVID-19 outbreak occurs: Plan
- During a COVID-19 outbreak: Act
- After a COVID-19 outbreak: Follow-up
- · Readiness Resources

Persons experiencing homelessness may be at risk for infection during an outbreak of COVID-19. This interim guidance is intended to support response planning by homeless service providers, including overnight emergency shelters, day shelters, and meal service providers.

COVID-19 is caused by a new virus. There is <u>much to learn about</u> the transmissibility, severity, and other features of the disease. Everyone can do their part to help plan, prepare, and respond to this emerging public health threat.

CDC has developed recommendations for homeless service providers about how to protect their staff, clients, and guests. The Before, During, and After sections of this guidance offer suggested strategies to help homeless service providers plan, prepare, and respond to this emerging public health threat.

#### Before a COVID-19 outbreak occurs in your community: Plan

Although it is not possible to know the course of the outbreak of COVID-19 in the United States, preparing now is the best way to protect people experiencing homelessness, homeless service provider.



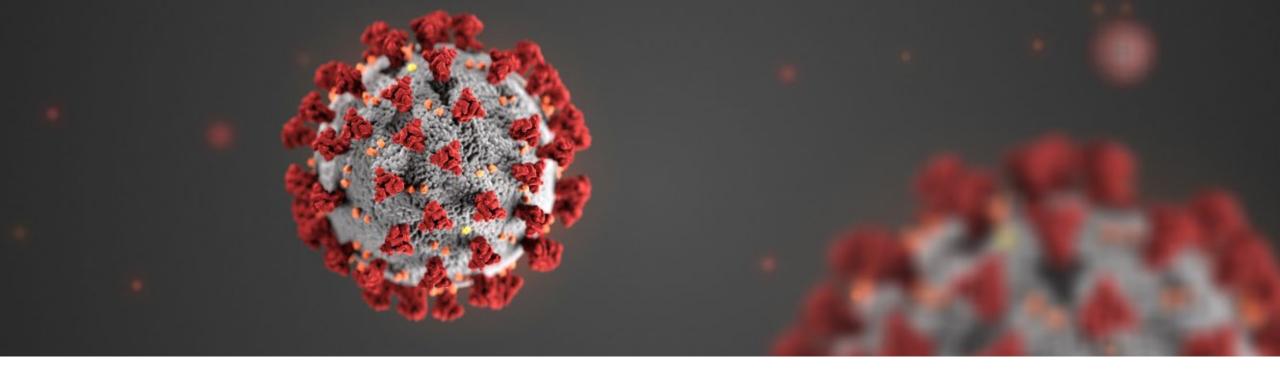
## Small update-- shelters and other service providers

https://www.cdc.gov/coronavirus/2019ncov/community/homeless-shelters/planprepare-respond.html

Provider serving people experiencing unsheltered homelessness

https://www.cdc.gov/coronavirus/2019ncov/community/homelessshelters/unsheltered-homelessness.html





For more information, contact CDC 1-800-CDC-INFO (232-4636)

TTY: 1-888-232-6348 www.cdc.gov

The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.



Office of Special Needs Assistance Programs

# DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

## **CARES Act Eviction Moratorium: Applicability**

Section 4024 of the CARES Act provides a temporary moratorium on eviction filings for nonpayment of rent for tenants:

- 1) that participate in certain federal assistance programs, including CoC, ESG, HOPWA
- 2) in dwellings with 1 to 4 families with a federally backed mortgage loan
- 3) in dwellings with 5 or more units (i.e., multifamily) with a federally backed multifamily mortgage loan

## **Eviction Moratorium: Intended Impact**

#### **Protections are designed to:**

- Alleviate the public health consequences of tenant displacement during the COVID-19 outbreak
- Stabilize renters during an economically precarious time



#### **Eviction Moratorium: Parameters**

#### **Duration of Eviction Moratorium**

- Protections begin on March 27, 2020
- Extends for 120 days (until July 24, 2020)

#### **Eviction Moratorium DOES NOT apply in the following cases:**

- No cause evictions
- Evictions filed before the moratorium took effect (March 27, 2020) – though no extra fees or penalties can be made during this time
- Evictions based on other reasons besides non-payment of rent



#### **Eviction Moratorium: Protections**

#### What types of eviction claims and fees are prohibited?

- New eviction actions for nonpayment of rent
- Fees, penalties, or other charges to the tenant related to nonpayment of rent - for someone in a covered property above
- Issuing a notice to vacate during the 120-day period
- Evicting a tenant after the moratorium expires except on 30-day notice—which may not be given until after the moratorium period.



#### **Eviction Moratorium: CoC Considerations**

- Share eviction moratorium information with homeless prevention programs
- Connect local legal aid services to people who are at risk of homelessness due to eviction:
- People facing eviction often are unfamiliar with:
  - the source of funding for their housing subsidies
  - the types of federal loans or funding programs that landlords use that apply to this moratorium

New FAQs posted on the HUD Exchange



### **CoC:** Disability Documentation for PSH

#### Requirement

#### **Applicability**

#### **Other Provisions**

A recipient providing PSH must document a qualifying disability of one of the household members. When documentation of disability is the intake worker's observation, the regulation requires the recipient to obtain additional confirming evidence within 45 days.

For the 6-month period beginning on the date of the waiver memorandum (3/31/2020), the requirement to have third party documentation of disability that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance documentation requirement is waived for any program participants admitted into PSH funded by the CoC Program

For the purposes of individuals and families housed in PSH from the date of this memorandum until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19, a written certification by the individual seeking assistance that they have a qualifying disability is considered acceptable documentation approved by HUD under 578.103(a)(4)(i)(B)

## **CoC: Disability Documentation for PSH**

## Suggested Recipient Documentation

## Suggested Client Level Documentation

- 1) Documentation of COVID-19 related constraints preventing collection of disability documentation such as shelterin-place orders or office closures;
- 2) Copy of waiver notification sent to HUD;
- 3) Emergency recordkeeping policies and procedures

- 1) Copies of certifications;
- 2) A note in the files of affected clients outlining application of the waiver and compliance with the timeframe.



## ESG: Mega-Waiver & CARES Act Highlights

#### **ESG Mega-Waivers**

#### CARES Act (ESG-CV)

- 1. HMIS Lead Activities 24 CFR 576.107(a)(2)
- 2. Re-Evaluations for Homelessness Prevention Assistance 24 CFR 576.401(b)
- 3. Housing Stability Case
  Management
  24 CFR 576.401(e)
- 4. Restriction of Rental Assistance to Units with Rent at or Below FMR 24 CFR 576.106(d)(1)

- No matching requirement
- No spending cap on emergency shelter and street outreach
- Up to 10% of the grant can be spent on administrative activities
- Income eligibility 50% of AMI for homelessness prevention
- Allows deviation from applicable procurement standards
- May not require program participants to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or services
- Citizen participation/consultation requirements can be waived
- No minimum period of use for emergency shelters

## Citizen Participation Public Comment Period for Consolidated Plan Amendment

Requirement

**Applicability** 

**Other Provisions** 

A CPD grantee may amend an approved consolidated plan in accordance with 24 CFR 91.505. Substantial amendments to the consolidated plan are subject to the citizen participation process in the grantee's citizen participation plan. The citizen participation plan must provide citizens with 30 days to comment on substantial amendments.

Through the end of the recipient's

2020 program

year, the 30-day

minimum for the required public comment period is waived for substantial amendments

Through the end of the recipient's than 5 days for public comments on each substantial amendment

Any recipient wishing to undertake further amendments to prior year plans following the 2020 program year can do so during the development of its FY 2021 Annual Action Plan

## Citizen Participation Public Comment Period for Consolidated Plan Amendment

#### **Suggested Recipient Documentation**

- 1) Documentation of the need to expedite the amendment and demonstrating both publication and 5-day comment period;
- 2) A record of all comments received, and responses must be submitted with the amendment;
- 3) Copy of waiver notification sent to HUD;
- 4) Emergency recordkeeping policies and procedures



## Citizen Participation Reasonable Notice and Opportunity to Comment

#### Requirement

As noted above, the regulations at 24 CFR 91.105 (for local governments) and 91.115 (for States) set forth the citizen participation plan requirements for recipients. For substantial amendments to the consolidated plan, the regulations require the recipient to follow its citizen participation plan to provide citizens with reasonable notice and opportunity to comment. The citizen participation plan must state how reasonable notice and opportunity to comment will be given.

#### **Applicability**

HUD waives 24 CFR 91.105(c)(2) and (k), 24 CFR 91.115(c)(2) and (i) and 24 CFR 91.401 to allow these grantees to determine what constitutes reasonable notice and opportunity to comment given their circumstances



### **Communication Strategies During COVID Response**

- Homeless crisis response systems are constantly evolving in their response to COVID-19
- Establishing a consistent communication strategy among key stakeholders is critical to ensuring that local partners are aware of resources available through the CoC
- Reach out to community-based coordinating partners to make them aware of CoC services: CES (changes, enhancements), homeless sheltering locations (new, expanded, changed) and prevention resources
  - United Way

Municipal partners

Faith-based organizations

Legal Aid

- Food Bank
- <u>Infectious Disease Toolkit for CoCs</u> has more information on effective communication strategies through every stage of a public health crisis



### Prioritize Your COVID-19 Response

- SNAPS understands your #1 priority right now is responding to COVID-19
- Don't stress about performance metrics, subrecipient monitoring, governance;
- HUD will take this extraordinary time into strong consideration for future monitoring, and the competition.
- CoCs are encouraged to be as flexible as possible when thinking through their local competition metrics.





## SSVF Response to COVID 19 Crisis



### SUPPLEMENTAL SSVF FUNDING

• Distributing an additional \$201.5 million for FY 2020 to SSVF grantees in the coming weeks.

- All recurring awards will get an increase of approximately 53 percent.
  - 1. Expand emergency housing capacity
  - 2. Expand prevention services
  - 3. Support HUD-VASH placements where PHAs are not fully functioning



#### STAFFORD ACT CHANGES

Align with local VA, CoC, and public health department response to COVID-19

- 45 day limit for emergency housing in motels/hotels suspended.
- 72 hour limit for individuals suspended.
- Limits on number of months for rental and utility assistance suspended.



#### EMERGENCY HOUSING ASSISTANCE

- Vulnerable Veterans should be targeted for EHA, however, grantees may use EHA in other situations
  - Self-Quarantine prior to entering other programs
  - Unsheltered
- Veterans support when placed in hotels
  - Check in calls (SSVF may supply phones)
  - Food Assistance may be needed
  - Screen & connect to medical care, 40% of homeless infected at any point during COVID-19 crisis (Culhane)



### CHANGES IN PREVENTION GUIDANCE

• Stage 2 screener eliminated

40 percent maximum spending on prevention waived

• EHA resources can be used for host families in Rapid Resolution

## Resources for CoCs and Homeless Assistance Providers on the HUD Exchange

## Infectious Disease Prevention & Response page on HUD Exchange

Submit a question on the <u>HUD Exchange Ask-A-Question (AAQ)</u>
 Portal

Check back regularly for new posts!



## Key Websites with Available Resources

**HUD:** https://www.hudexchange.info/homelessness-assistance/diseases/infectious-disease-prevention-response/

**CDC:** https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/index.html

NHCHC: <a href="https://nhchc.org/clinical-practice/diseases-and-conditions/influenza/">https://nhchc.org/clinical-practice/diseases-and-conditions/influenza/</a>

**USICH:** <a href="https://www.usich.gov/tools-for-action/coronavirus-covid-19-resources/">https://www.usich.gov/tools-for-action/coronavirus-covid-19-resources/</a>

VA: <a href="https://www.publichealth.va.gov/n-coronavirus/index.asp">https://www.publichealth.va.gov/n-coronavirus/index.asp</a>

**HRSA:** <a href="https://bphc.hrsa.gov/emergency-response/coronavirus-frequently-asked-questions.html">https://bphc.hrsa.gov/emergency-response/coronavirus-frequently-asked-questions.html</a>



### CONTACTS

For additional information or assistance, contact:

- Centers for Disease Control and Prevention:
   www.cdc.gov/COVID19; 1-800-CDC-INFO (232-4636); TTY: 1-888-232-6348
- Department of Housing and Urban Development:
   HUD Exchange Ask-A-Question (AAQ) Portal
- Department of Veterans Affairs High Consequence Infection (HCI)
   Preparedness Program:

vhahcigenerall@va.gov





## Q & A

