Non-Congregate Shelter (NCS) has become an integral part of many community efforts to protect particularly vulnerable people experiencing homelessness during the COVID-19 crisis. This document offers guidance to help communities facilitate rapid exits from NCS directly into housing. Since COVID-19 has disproportionately affected Black people, Indigenous people and people of color (BIPOC) because of inequities in health outcomes and rates of homelessness experienced by these populations, NCS rehousing strategies should consider racial equity in their design.

Background
NCS has been instrumental in preventing virus infection among older adults experiencing homelessness and other people whose age or underlying health conditions put them at higher risk for dangerous complications from COVID-19. Many communities have complemented these NCS facilities with Alternative Care Sites (ACS) that isolate and quarantine people who are COVID-positive, have been exposed to a COVID-positive person, or have COVID-like symptoms and are awaiting test results. Hotels, motels, dormitories, and medical respite/recuperative care facilities have all functioned as sites for both NCS and ACS facilities. Rehousing residents directly out of NCS and similar facilities, which will reduce client exposure to the coronavirus, should be central to planning and implementing broader rehousing strategies.

NCS programs offer communities employing rehousing strategies a head start in rapidly identifying a cohort of people at high risk for bad outcomes from infection. They also create an ideal platform for streamlining the process of helping people find and move into housing that meets their needs. All the steps in the housing process-- from enrollment and assessment to documentation of eligibility to housing navigation to case management-- are ideally completed while the client is still residing in NCS.

When streamlining re-housing processes and prioritizing high-risk people residing temporarily in NCS, communities should work to ensure that their efforts do not perpetuate existing racial inequities by centering racial equity in all of their COVID-19 response planning. Key steps to doing so include providing an equal voice for BIPOC and people with lived experience of homelessness at planning tables, and establishing specific data metrics to ensure that whether BIPOC are being served in NCS and successfully rehoused at rates that will help reduce disparities in outcomes for this population. In addition, communities should carefully evaluate the racial and ethnic makeup of NCS populations and any potential bias in entry policies and procedures to ensure that a focus on NCS rehousing strategies does not deepen inequities in housing and health outcomes.

Collaborative Strategy Development: Examples from the Field
Many communities have rapidly engaged in comprehensive planning to leverage newly created NCS facilities as they streamline rehousing strategies. This planning has focused on flexing Coordinated Entry, landlord engagement, and other processes in a highly coordinated way. It has also focused on synching NCS policies and procedures with broader strategies to cut through red tape, eliminate bottlenecks, increase available housing units, expedite paperwork, and thereby accelerate the time it takes to engage a household experiencing homelessness to help them find housing. This planning should also consider additional challenges that BIPOC may face in accessing housing and other resources due to systemic and structural racism (landlord discrimination, biased Coordinated Entry system assessment and prioritization policies, housing barriers related to justice involvement or prior evictions, etc.).

For example, Los Angeles has explored a flexible approach to meeting the immediate rehousing needs of the large cohort of its NCS resident population with pre-existing health conditions that necessitate an intensive level of support most typically available in Permanent Supportive Housing (PSH). Recognizing that wait times for PSH units can create bottlenecks in helping people exit from NCS into PSH, Los Angeles is exploring adaptations to its traditional Rapid Rehousing (RRH) models. These adaptations will bring intensive and
specialized assistance to RRH units housing people with barriers to stability such as limited mobility, memory loss or other cognitive impairments, and challenges related to mental illness or substance use disorder. The Los Angeles RRH approach mirrors Houston’s COVID CARES Housing Initiative strategy to use RRH units as a bridge to PSH. One notable challenge for Los Angeles’ NCS rehousing strategy is that the Black and Hispanic clients are underrepresented in the Project Roomkey (PRK) population compared to the general homeless population, so a rehousing strategy prioritizing PRK may disadvantage BIPOC and further racial inequities if steps are not taken to address the disproportionality.

Both Los Angeles and Houston, as well as Chicago, have rapidly mapped out needed process adjustments and are weaving these adjustments together in a coordinated way. These communities have recognized that planning and implementing an expedited rehousing strategy requires extensive data and analytics. Data from Coordinated Entry, data showing numbers and types of exits from NCS, and data related to demographics Several data points will be critical to measuring the effectiveness and equity of new processes and making adjustments as needed. Persons with lived expertise of homelessness, representatives from the LGBTQ+ community, BIPOC, and others most impacted by local housing and health disparities must have an equal voice in progress measurement and decision-making within planning and implementation processes.

Managers on the ground, governing boards, and other community stakeholders should also review data regarding residents’ health, mental health, and other service needs, household size, and other needs to ensure that appropriate housing options and supportive services are available to meet the needs of clients being rehoused from NCS. Be sure to analyze data from an equity perspective, taking into account how the strategy is helping BIPOC and other marginalized groups, such as LGBTQ+ identifying people, to overcome barriers and obtain housing. COVID-19 Homeless System Response: Advancing Racial Equity through Assessments and Prioritization provides guidance for communities in how to use data and evaluation to avoid inadvertently furthering racial inequities in rehousing efforts.

A Checklist for Getting Started

The checklist below draws on current COVID-19 rehousing work in Chicago, Houston, and Los Angeles. It outlines tactics for accelerating exits from NCS into appropriate housing that matches short-term and long-term needs tied to COVID-19 risk mitigation and pre-existing health conditions. This checklist complements a step-by-step planning outline provided in HUD COVID-19 guidance on planning a housing surge. A housing surge planning outline can help communities create the foundation for NCS rehousing success.

Maximizing Movement out of NCS into Housing: Recommended Tactics

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<tr>
<th>Increase Capacity for Rehousing out of NCS Facilities</th>
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<tr>
<td>Create dedicated housing navigator capacity, possibly by hiring new staff, to work exclusively on helping people move out of NCS into housing</td>
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<th>Adopt a population-specific one-day housing surge approach utilizing one-stop-shop rehousing fairs on site at NCS facilities:</th>
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<td>● If safety concerns preclude an onsite rehousing fair, options could include scheduling events outside or offering a virtual fair that is exclusively for NCS residents. When moving to a virtual format, accommodate people without internet access by offering in-person appointments with appropriate social distancing or access to the communications equipment they will need to participate.</td>
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<td>● Ensure that these events are specifically tailored to the needs of NCS residents.</td>
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<td>● Use navigators to guide NCS clients through every stage of the process at stations resourced specifically for each stage.</td>
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<td>● Work in close coordination with Coordinated Entry (CE) staff.</td>
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<th>Create or Adapt Processes for Assessing and Matching to Rehousing Options</th>
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<td>Provide a flexible approach in matching clients to a diverse range of possible long-term housing options on a client-by-client basis.</td>
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- Adapt assessment tools to accurately gauge the level and type of support and accommodation required by NCS residents who have needs related to chronic medical conditions, mental health conditions, limited mobility, visual impairment, hearing impairment, or memory issues to successfully transition to housing. Ensure that any adaptations are designed in a way to advance racial equity and avoid deepening existing inequities.

Ensure close coordination between Coordinated Entry prioritization policies and expedited assessment and matching processes developed to maximize placements from NCS into housing.
- Coordination must account for evolving changes to centralized CE policies and procedures per Public Health recommendations related to the outbreak.
- Coordination must also account for new programs and resources that people can access through CE.

Housing should be the first option, but in cases where there are unavoidable delays in identifying housing, secure interim housing and attach intensive case management and other supports in order to ensure that clients are immediately housed in equally safe and appropriate interim housing, and on a prioritized path to housing.

**Adapt Existing Rapid Rehousing Models**

Decrease time between enrollment and move in dates, while assuring accommodation of needs related to chronic medical conditions (e.g., limited mobility, visual impairment, hearing impairment, and/or memory issues) and mental health conditions. This may require changes to RRH program policies and procedures.

CoC policies should allow RRH providers to have flexibility in providing financial assistance so that they can readily extend rental assistance beyond traditional timeframes for people with ongoing needs.
- For example, if your community’s average for rental assistance is six months, be prepared to offer up to 24 months to accommodate clients with higher needs for ongoing rental support.
- Another option for flexibility is to offer a shallower subsidy than traditionally offered to clients (for example, having clients pay 15% of their income over 1 year instead of 30% of income over 6 months) as a way of providing a lower level of rental assistance over a longer period of time to clients capable of independent living.

Ensure that programs adapting traditional RRH models facilitate transition into PSH when long-term supports and rental assistance is needed to reduce returns to homelessness.

**Boost Capacity to Meet Acute and Chronic Health Needs**

Provide Housing Stabilization Case Management Services (HSCMS) to all NCS clients, encompassing mainstream benefits enrollment (e.g. SSI, SSDI), housing transition counseling, landlord negotiation, coordination of move-in assistance, and transition to community health and service supports.

Supplement NCS on-site supports with skilled specialty providers who can provide additional supports to residents who need them.

Assure that these supports follow clients into housing post-NCS, including expedited linkage to in-home personal care and assistance in obtaining durable medical equipment (DME) and other assistive devices.

**Create Data and Analytics Policies and Procedures to Gauge Success in Rehousing Out of NCS**

Create a database or enhance HMIS to track all NCS residents, their specific NCS site, their move-in and projected move-out dates, and supportive services and accommodations they will continue to need after exiting the NCS program.
- Maintain data on the inventory of housing and interim facilities and slots, and ensure that both sources accurately reflect these data points as they change.
- Ensure that systems track key demographic information, including race and ethnicity.

Update system performance and evaluation policies and procedures to mirror changes in rehousing policies and procedures.
- Assure that updates enable homeless services system leadership and community stakeholders to access and understand the data and evaluate efforts to expedite rehousing out of NCS.

Track housing placements by racial demographics to ensure that exits to housing reduce inequities experienced by BIPOC.