MEMORANDUM

FROM: Steve DiLella, Director of Individual & Family Support Programs

TO: DOH Funded Rapid Re-Housing Providers and CAN Staff

CC: Commissioner Seila Mosquera-Bruno, Deputy Commissioner Shante Hanks, Leigh Shields-Church, Kara Zichichi, Katie Durand, Beau Anderson, Richard Cho (CCEH), Annie Stockton (CCADV), John Merz (ACT)

DATE: December 9, 2020

RE: Rapid Re-Housing Prioritization & Paperwork Requirements during State’s Declaration of Public Health & Civil Preparedness Emergency -- UPDATED

Dear RRH Provider & CAN Staff:

Please share locally with your direct-service RRH staff. This letter serves as an update to memorandum dated March 17, 2020. At the beginning of the COVID-19 pandemic, DOH made every effort to streamline operational procedures for Rapid Re-Housing providers (CoC/YHDP/ESG) to quickly house individuals and families from shelters. These changes were made to align with statewide COVID-19 response protocols to decompress congregate shelters and house the most vulnerable in the homeless system.

1) Continue to prioritize Rapid Re-Housing Openings for Individuals 60 years and older.
   - Your CAN’s BNL facilitator will be receiving a list of individuals 60+ years old currently enrolled in emergency shelter projects. Please utilize this list to effectively develop a housing plan for these individuals.
   - To the extent possible, please leverage staff locally to rapidly exit individuals from shelter.
   - Explain to households that the State is attempting to minimize the use of congregate living settings to prevent the potential spread of COVID 19. Shelters are to be used as an absolute last resort. If the person has anywhere else to stay, even temporarily, it is safer for the person.

2) Continue to use Rapid Re-Housing resources to support individuals and families needing a “rapid exit” model to exit unsheltered/sheltered living situations. If an individual or family has a viable housing plan and low/no service needs as evidenced by a low VI-SPDAT score and/or provider assessment, the individual or family can be connected to Rapid Re-Housing as soon as possible. This is for households that are expected to attain housing stability with no more than security deposit and/or short-term rental
assistance (not to exceed 3 months). The CAN does not need follow usual prioritization practices for the individuals and families using a “rapid exit” model.

3) **CoC / YHDP / ESG RRH Paperwork Requirements for initial lease-up** - UPDATED
During the pandemic, HUD has not waived Rapid Re-Housing paperwork requirements for administering RRH projects. Therefore, effective immediately, providers will need to resume use of all RRH forms. Please refer to the RRH Client File Checklist if you have questions.

- Providers do not need to obtain documentation or forms retroactively. The requirement will be for any tenants who sign a lease for December 15, 2020 and after. Monthly and re-certification paperwork should continue for all clients.
- Since many staff continue to work from home due to agency protocols, electronic signatures continue to be acceptable.
- Housing Quality Standards (HQS) inspections can continue to be done remotely. Please refer to DOH’s CoC/YHDP/ESG Emergency Waiver Policy for additional details regarding this and other HUD waiver modifications and their corresponding timelines.
- Case management activities can continue to be conducted remotely to limit any routine face-to-face client contact.

4) To Rapidly Exit youth from shelter, continue to use YHDP Rapid Exit and YHDP RRH funding. YHDP funding remains limited to households where HOH is aged 18-24 at entry, but it’s permissible to add an older individual to the household (the older household member is ineligible for YHDP supportive services and providers can’t house the family in a larger unit based on this additional older member unless they wish to treat as a shared housing arrangement instead).

5) Exception Forms Resumed. For clients who are nearing their 1 yr program enrollment anniversary, providers will need to resume completion of an Exception Form to continue to serve households with income at or below 50% AMI beyond 12 months. HUD has increased AMI limits for ESG to 50% at annual renewal due to the pandemic. Please note this exception on the RRH Exemption Form. HUD continues to require that annual assessments (based on program enrollment date) be completed in HMIS and that annual HQS inspections be conducted for clients who are receiving rental assistance beyond 12 months.

Please note the following time limits for receipt of rental assistance:

- ESG-CV participants have a 12-month cap for rental assistance. The intent is to ensure that more households receive RRH assistance to respond to the pandemic.

- Current ESG & CoC (annual allocations) participants may receive rental assistance for an additional 6 months of rental assistance beyond the usual 24-month limitation. The intent is to ensure that current program participants do not lose their housing due to the public health crisis. Please use these additional 6 months in a limited capacity. RRH providers should continue to maintain messaging that clients are being offered the least amount of assistance to stabilize housing. HUD has waived the limitation that a participant can only receive rental assistance for up to 24 months in a 3-year period during the period beginning on the presumed start of this crisis, January 21, 2020 through February 28, 2021.

For ongoing updates pertaining to the homeless service system, please see CCEH’s Coronavirus and Homeless Resource Guide. Ongoing updates are also available on the State of Connecticut website. These updated protocols for DOH administered ESG/COC Rapid Re-Housing project will be in effect until the
Declaration of Public Health and Civil Preparedness Emergency enacted by Governor Lamont on March 10, 2020 is lifted or additional waivers from the U.S. Department of Housing and Urban Development are issued.

As always, if you have any immediate concerns, please contact Katie Durand (kathleen.durand@ct.gov), Leigh Shields-Church (leigh.shields-church@ct.gov), or Kara Zichichi (kara.zichichi@ct.gov). Thank you for all of your flexibility, and efforts as we remain diligent in creating a safe environment for the people we serve and our staff.