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, Evonne Klein (CCEH), Annie Stockton (CCADV), John Merz (ACT)

DATE: March 1, 2021

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 December 9, 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) Prioritize Rapid Rehousing to both persons age 60 and older AND those under age 60 with long histories of homelessness (excluding youth/young adults)

   • Your CAN’s BNL facilitator will continue to sort the BNL for those 60+ years old currently enrolled in emergency shelter and hotel projects. Please utilize this list to effectively develop a housing plan for these individuals.
   
   • We have received feedback from the CANs that the population of those 60+ over has been reduced and there is a need to broaden the prioritization to the larger population. We advise to do a “proportional allocation” approach, in which 1 out of every 5 referrals is set aside for the elderly. The remaining four referrals should be prioritized for those with the longest histories of homelessness in your CAN. The ratio may vary based on your population in your CAN.
   
   • If you have matched all persons aged 60+ in your CAN, you may move to a prioritization process entirely based on length of time homeless.
   
   • To the extent possible, please leverage staff locally to rapidly exit individuals from shelter/hotel. Rapid exit does not require prioritization through the CAN and should be accessed
immediately for those who only require short term assistance (less than three months) to exit homelessness quickly.

- 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) Retiring of the VI-SPDAT
DOH is currently working with our statewide partners, including BOS and ODFC, to retire the VI-SPDAT for individuals and families. We were notified that the developer of the tool will no longer support the tool and encouraged communities to retire using the tool. In CT, this will require updating our formal policies and procedures and updating HMIS to transition to a new version of the BNL. Our plan is to move towards a data-based prioritization process in which length of time homeless and disability status are the primary factors in sorting the BNL. There are continued discussions about other data elements to include in prioritization.

Your CAN should continue administering the VI-SPDAT so households show up on the BNL for appropriate matching. **VI-SPDAT scores should not be a primary determining factor in what type of intervention is offered.** If a household declines to complete the survey, or it is clinically inappropriate to administer, you may enter blank survey to get the person on the BNL.

**Until an alternate option for youth prioritization is established, CANs should continue using the Next Step Tool as the primary factor for determining prioritization for youth rapid rehousing.**

In the near future, we will release more details on a common assessment process for the State. Continue to develop “Housing Plans” will all homeless households based on their income, interest, disability status and availability of resources. This process will be critical moving forward.

3) CoC / YHDP/ ESG RRH Paperwork Requirements - REMINDERS
During the pandemic, HUD has not waived Rapid Re-Housing paperwork requirements for administering RRH projects. Therefore providers must use all the RRH forms. Please refer to the **RRH Client File Checklist** if you have questions.

- 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.
- For clients who are nearing their 1 year program enrollment anniversary, providers **will** need to complete an Exception Form to continue to serve households with income at or below 30% AMI beyond 12 months for ESG and 50% AMI for CoC. (Guidance from December 2020 stated households needed to be under 50% AMI for ESG, this has since been updated based on HUD guidance).
- You do NOT need to do an Exception Form for VI-SPDAT scores.
- 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.

- **ESG**: HUD had previously issued a waiver that ESG participants may receive rental assistance for an additional 6 months beyond the usual 24 month limitation. That waiver expired today, March 1, 2021. Regular ESG participants are now limited to 24 months of assistance from the start date of their program enrollment.

- **CoC & YHDP**: (annual allocations) Program participants who have reached 24 months of rental assistance and who will not be able to afford their rent without additional rental assistance will be eligible to receive rental assistance until 3 months after a state or local public health official has determined that special measures are no longer necessary to prevent the spread of COVID-19. RRH providers should continue to maintain messaging that clients are being offered the least amount of assistance to stabilize housing.

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).

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.