



# COVID-19 Expedited Housing Strategy & Interim Coordinated Entry Policy

**Effective Date: May 20, 2020**

Tucson Pima Collaboration to End Homelessness (TPCH) acknowledges that we can mitigate the spread of COVID-19 among people experiencing homelessness by ensuring that as many residents of Tucson/Pima County as possible are in safe, healthy homes where they can shelter in place, ensure social distancing, and comply with isolation and quarantine guidelines. Therefore, we are launching the COVID-19 Expedited Housing Initiative and implementing an Interim Coordinated Entry Policy. This policy incorporates and replaces all previously issued interim guidance related to Coordinated Entry and the community’s COVID-19 response. This policy supersedes the TPCH Coordinated Entry Policies and Procedures.

The Expedited Housing Strategy and Interim Coordinated Entry Policy shall be in effect until rescinded or amended by majority vote of the TPCH Board of Directors. The TPCH Board shall review the strategy and policy at its monthly meeting and amend or rescind when it deems that changes are appropriate to meet community needs. The City of Tucson (Collaborative Applicant/CoC Lead) and Pima County (HMIS Lead) are charged with collaboratively facilitating the adjustments reflected in the housing strategy and interim Coordinated Entry policy.

<b>Provider Adjustments</b>	<b>System Adjustments</b>
<b>The TPCH Lead Entities (City of Tucson and Pima County) will provide technical assistance, create guidance, and manage accountability for these areas.</b>	<b>The City of Tucson and Pima County will coordinate these efforts under the oversight of the TPCH Board Officers.</b>
Providers should begin to: <ul style="list-style-type: none"> <li>• Leverage waivers to bypass regulatory requirements to house people quickly (i.e. disability documentation, FMR, etc.)</li> <li>• Waive any internal agency requirements to accessing housing units and document the changes being made.</li> <li>• Watch for new guidance from the City of Tucson and/or Pima County regarding the implementation processes for this policy.</li> <li>• Prepare for implementation of chronic homelessness and Dedicated Plus eligibility within rapid rehousing projects.</li> <li>• Prepare for implementation of enhanced assessment of service needs and move-on strategy within permanent supportive housing projects.</li> <li>• Prepare for implementation of a COVID-19 Risk Screening &amp; Triage Tool for use in Coordinated Entry assessment.</li> </ul>	The TPCH Lead Entities will begin working on: <ul style="list-style-type: none"> <li>• Creating one or more community matching team(s) to direct Coordinated Entry referrals to Continuum of Care Program, CARES Act, and voucher programs.</li> <li>• System-wide landlord engagement.</li> <li>• Establishing a standard verification of chronic homelessness and Dedicated Plus eligibility for use by all permanent housing projects.</li> <li>• Supporting the work of the TPCH Coordinated Entry Committee to establish a formal move-on strategy from permanent supportive housing projects.</li> <li>• Providing semi-monthly reports to the TPCH Board and stakeholders including key indicators of progress and success.</li> <li>• Adapt the existing TPCH Shelter Screening &amp; Triage Tool for use in Coordinated Entry assessment.</li> </ul>

## **COORDINATED ENTRY ASSESSMENT**

TPCH will permit documented verbal consent for release of information and entry of personal information into the HMIS for the purposes of conducting and sharing information related to Coordinated Entry assessment, shelter screening and triage, and referral to quarantine and isolation shelter services.

To reduce the risk of infectious disease transmission, the aforementioned assessments and screening may be conducted by phone at TPCH Coordinated Entry Access Points. Coordinated Entry assessors are required to review the release of information and Coordinated Entry privacy statement with persons conducting assessments by phone, document their verbal consent, and maintain record of that documentation at the agency site. The option of conducting assessments by phone is voluntary and agencies are responsible for determining whether there are laws, regulations, or other relevant oversight guidance which prohibits them from doing so at their site.

Written consent should be obtained whenever possible and must be obtained if an assessment is being conducted at any site in which in-person contact is appropriate (i.e. shelter settings, street outreach encampments, etc.)

## **COORDINATED ENTRY PRIORITIZATION**

### **Transitional and Permanent Housing funded through HUD's Continuum of Care Program and/or local CARES Act allocations**

TPCH will prioritize persons affected by and at high risk for severe illness if infected with COVID-19 for all openings in transitional housing, rapid rehousing, and permanent supportive housing funded through HUD's Continuum of Care Program and state and local CARES Act allocations. For the purposes of documenting this prioritization, the following persons shall be equally prioritized for housing placement:

- Persons with active COVID-19 infection
- Persons being released from health care facilities with active COVID-19 infection who were experiencing sheltered or unsheltered homelessness at the time of entry to the health facility
- Persons recovering from active COVID-19 infection
- Persons who are identified by being at risk of severe illness as defined by the U.S. Centers for Disease Control and Prevention (CDC).

Local assessment tools will continue to be updated as new information is released by the CDC. VI-SPDAT scores will be used to help inform referrals to the most appropriate project types; however, the VI-SPDAT score of a person/household will not be used to limit referral of that person/household to specific project type(s). Projects are expected to serve referred persons/households regardless of VI-SPDAT score.

Persons/households accepted by transitional and permanent housing projects must still meet all project eligibility criteria as indicated by statute, regulation, and the agency's grant agreement.

In the event that the priority list includes no persons/households who meet the above criteria, the HMIS Lead will make referrals based on the prioritization policy outlined in the TPCH Written Standards.

## **Transitional and Permanent Housing Projects funded through HUD-VASH**

Referral to HUD-VASH shall continue to be made following the HUD-VASH Prioritization Policy outlined in the TPCH Written Standards. The U.S. Department of Veterans Affairs is empowered to amend this prioritization process upon written notification to the TPCH Collaborative Applicant/CoC Lead and HMIS Lead. The Collaborative Applicant/CoC Lead shall notify the TPCH Board of any changes initiated by the U.S. Department of Veterans Affairs and post such changes to the TPCH website.

## **Transitional and Permanent Housing Projects funded through all other sources**

Unless directed otherwise by the project's funding agency, persons who meet the following criteria will be equally prioritized for referral to transitional and permanent housing projects not funded through the Continuum of Care Program, HUD-VASH, or CARES Act allocations.

- Persons residing in projects that are ending
- Persons residing in emergency shelter
- Persons who have had documented contact with an HMIS-participating outreach program in the past 30 days

The HMIS Lead will continue to facilitate direct matching of persons/households to these projects using the prioritization policy outlined in the TPCH Written Standards (with the exception of prioritizing persons who are unsheltered) and filtering the priority list for persons who meet the above criteria. In the event that the priority list includes no persons/households meeting the above criteria, the HMIS Lead will make referrals based on the prioritization policy outlined in the TPCH Written Standards. The HMIS Lead shall be empowered to determine the best strategy for managing referrals of the priority group established through this policy using cohorts or other groupings as appropriate.

Persons accepted by transitional and permanent housing projects must still meet all project eligibility criteria indicated by applicable statute, regulation, and the agency's grant agreement.

## **PROJECT CAPACITY**

Agencies providing transitional and permanent housing services should strive to achieve social distancing recommendations issued by the U.S. Centers for Disease Control and Prevention within project facilities. If a project requires a reduction in bed capacity to achieve social distancing recommendations, the agency should immediately notify the HMIS Lead to ensure that accurate recordkeeping of community bed inventory is maintained.

Projects funded through the U.S. Department of Housing & Urban Development and delivered through units with single person/household occupancy are expected to maintain the number of year-round units indicated in the agency's HUD grant agreement and should promptly request and accept referrals to fill project vacancies.

## **EXPEDITED HOUSING PLACEMENT**

### **Coordinated Entry Referral Requests from Housing Projects**

Projects may not request more referrals than they have immediate project openings. Projects requesting Coordinated Entry referrals must be able to initiate housing services within 7 calendar days of making contact with referred persons/households.

### **Locating Persons Referred to Transitional and Permanent Housing Projects**

The HMIS Lead will immediately add all persons referred to transitional and permanent housing projects to the community's "Need to Locate" list (aka outreach list) in the HMIS and will provide the agency accepting the referral with key points of contact to assist in locating the referred person or household (i.e. shelter in which the person/household is residing, street outreach worker(s) with whom the person/household has had recent contact, etc.) Outreach and housing projects should implement strategies that expedite efforts to locate referred persons/households.

Projects accepting referrals from Coordinated Entry hold primary responsibility for locating those referred persons/households and shall initiate attempt to locate efforts within 2 business days of accepting the referral. Project staff shall complete the TPCH Outreach Checklist and exhaust all means available to contact the person/household within 7 calendar days of referral date.

### **Return of referrals to Coordinated Entry**

If a referred person/household cannot be located within 7 calendar days, the referral shall be returned to Coordinated Entry. The HMIS Lead will place the returned person/household on inactive status and issue a new referral to the project. Access Points (including shelter and outreach staff) should immediately re-refer persons for whom contact attempts were unsuccessful if they re-appear for services.

The TPCH Referral Return Policy enacted in August 2019 requiring the return of any referrals into the Coordinated Entry system for which a triage and diversion screening was not conducted or did not indicate the appropriateness of a VI-SPDAT assessment is suspended.

All projects are still required to complete the triage and diversion tool as outlined in current Coordinated Entry Policies and Procedures and should not refer households that are not prioritized for VI-SPDAT assessment based on triage and diversion results. This suspension is intended to reduce the risk of a household not being referred and therefore potentially matched to transitional or permanent housing as a result of assessor error or inability to make a correction and re-refer due to staffing shortage.

### **Case Conferencing - Persons already referred to Transitional and Permanent Housing projects**

In-person case conferencing of persons referred to transitional or permanent housing projects is suspended. Agencies with outstanding Coordinated Entry referrals must provide a written status update on all households referred every 14 days until the household is housed. Status updates must be submitted to the HMIS Lead using Revelation or emailing HMISHelp@pima.gov on the schedule determined and published by the HMIS Lead.

## **Case Conferencing - Persons to be referred to Transitional and Permanent Housing projects funded through the HUD Continuum of Care Program and CARES Act allocations**

The TPCH Collaborative Applicant/CoC Lead, in collaboration with the HMIS Lead, shall establish a community matching team responsible for coordinating and directing referrals to transitional and permanent housing projects funded through the HUD Continuum of Care Program and CARES Act allocations. The community matching team will also initiate referrals to other housing options and/or services not dedicated for persons experiencing homelessness as appropriate.

The HMIS Lead shall facilitate referrals as directed by the community matching team. The community matching team shall be empowered to determine the best strategy for managing referrals from the priority group established through this policy using cohorts or other groupings as appropriate.

## **Case Conferencing – Persons to be referred to Transitional and Permanent Housing projects not funded through the HUD Continuum of Care Program, HUD-VASH, and CARES Act allocations**

Case conferencing shall not be conducted to initiate referrals to transitional and permanent housing projects funded through sources other than the HUD Continuum of Care Program, HUD-VASH, and CARES Act allocations. As indicated above, the HMIS Lead shall directly coordinate referrals to these projects using TPCH Prioritization Policy outlined in the TPCH Written Standards, filtering for those who meet the prioritization criteria for these projects as described above.

## **Use of waivers to expedite housing placement**

Projects are expected to remove barriers that impede the rapid placement of participants in housing. Agencies should apply for and make use of applicable waivers to expedite the housing process when appropriate. Any requests for regulatory waivers pertaining to Continuum of Care and Emergency Solutions Grant projects must be approved by HUD and filed with the TPCH Collaborative Applicant/CoC Lead Agency.

## **EFFORTS TO STIMULATE POSITIVE MOVEMENT THROUGH THE SUPPORTIVE HOUSING SYSTEM**

### **Project Transfers**

Prioritized persons/households may be referred to time limited transitional and/or rapid rehousing project types who are eligible for and would benefit from non-time limited permanent supportive housing options. Such persons/households may be transferred to permanent supportive housing when vacancies exist provided that:

- The person/household's eligibility for permanent supportive housing is documented at the time of entry to the rapid rehousing project,
- The project has attempted to achieve success through rapid rehousing services and has completed an assessment of service needs indicating that the person/household's service needs are significant enough to require permanent supportive housing rather than other non-

- time limited housing supports (i.e. voucher, low-income/affordable housing, etc.), and
- There are no alternative non-time limited housing subsidies with appropriate supportive services available to the person (i.e. Arizona Longer Term Care System, Medicaid housing services, etc.)

### **Documentation of Chronic Homelessness and Dedicated Plus Eligibility**

In order to permit the project transfer process described above, all permanent housing projects (including rapid rehousing projects and permanent supportive housing projects not dedicated to persons experiencing chronic homelessness) must document participants' eligibility for permanent supportive housing at the time of project entry. This must be completed as follows:

- Complete the HUD-required data elements and TPCH Chronic Homelessness/Dedicated Plus Verification assessments within the HMIS,
- Make all reasonable attempts to obtain third-party documentation of chronic homelessness and Dedicated Plus eligibility, and upload documentation within the HMIS, and
- Provide uploaded documentation to the permanent supportive housing project to which a participant is referred if requested and the participant has signed an HMIS Release of Information.

### **Periodic Assessment of Service Needs**

All permanent housing projects, including rapid rehousing and permanent supportive housing, shall conduct and document in the HMIS a periodic assessment of service needs using the SPDAT, Y-SPDAT, or F-SPDAT as appropriate to the member(s) of the household. At the time of periodic assessment of service needs, projects must also post and update to the annual assessment included in the HMIS. Periodic assessment of service needs shall be conducted at the time of entry to the project and not less than every 6 months thereafter.

Participants in rapid rehousing projects identified as being in need of permanent supportive housing after 6 months shall be referred to the community matching team(s) for review and possible re-referral to permanent supportive housing based on project availability and community need.

Participants in permanent supportive housing projects identified as no longer being in need of permanent supportive housing shall be supported to engage in non-time limited housing supports more appropriate to their level of need including but not limited to voucher programs and low-income/affordable housing properties.

### **Move-On Strategy**

The TPCH Coordinated Entry Committee shall develop and bring forward to the TPCH Board for review and approval a comprehensive move-on strategy to provide a formal and standard approach to promoting the positive movement of people in non-time limited permanent supportive housing to alternative housing resources once service needs diminish. The draft policy shall be provided to the TPCH Board no later than August 31, 2020.

## **TRANSPARENCY AND INFORMATION SHARING**

Outreach, shelter, and transitional and permanent housing projects are expected to maintain transparency and commit to sharing information that demonstrates its willingness and best effort to participate in coordinated community planning and response to the COVID-19 crisis. Projects are expected to provide accurate information on capacity, current operations, infection rates among participants, and changes to project implementation resulting from the crisis.

The CoC Board strongly encourages all emergency shelters operating in Pima County to enter their shelter projects into Shelter Point with permission for community visibility. Shelter Point is integrated within the HMIS system and makes real-time bed capacity publicly available on the TPCH website. Shelter projects interested in participating in Shelter Point should contact [HMISHelp@pima.gov](mailto:HMISHelp@pima.gov).