



Model Transitions from Non-Congregate Shelter: Joint Recommendations for Assisting People Experiencing Homelessness

**September 22, 2021** 

#### **PURPOSE**

In June 2020, the U.S. Department of Housing and Urban Development (HUD), the Federal Emergency Management Agency (FEMA), and the Centers for Disease Control and Prevention (CDC) published Federal Funding Priority Order for Non-Congregate Shelter During COVID-19, which provided funding information to organizations providing assistance to people experiencing homelessness, including non-congregate shelter (NCS)<sup>1</sup> specific to the COVID-19 declared disaster. The purpose of this document is to supplement that previous publication by providing information to communities on strategies and funding sources so individuals and families experiencing homelessness and currently being sheltered in COVID-specific NCS can avoid returning to homelessness and, instead, be stably housed when they leave COVID-specific NCS. FEMA continues to provide reimbursement under Public Assistance (PA) to eligible applicants for COVID-specific NCS. This funding is available for COVID-specific NCS to meet immediate threats to public health and safety due directly to the COVID-19 pandemic, as stipulated in FEMA guidance. FEMA will provide ample notice (not less than 60-days) to PA applicants once an end date for availability of COVID-specific NCS funding has been determined. As of the date this document was published, FEMA will provide 100 percent cost share for COVID-specific NCS until December 31, 2021 as provided by the President's Memorandum on Maximizing Assistance to Respond to COVID-19.

In addition to discussing strategies that should be employed and practices that have been successful in re-housing people experiencing homelessness and being sheltered in NCS, this document will reference resources currently available in many communities that may be leveraged for transitioning households currently experiencing homelessness who are sheltering in COVID-specific NCS to other sheltering or housing resources. It is imperative that communities ensure that exits to unsheltered homelessness are avoided whenever possible and, ideally, all households are stably housed.

In communities where rates of COVID-19 are rising, COVID-specific NCS will remain available to meet the need for isolation and quarantine<sup>2</sup> to keep people safe from contracting and spreading COVID-19. As COVID-19 variants escalate across the United States, FEMA continues to provide support to SLTT governments in the form of COVID-specific NCS. Communities should begin using the strategies and resources highlighted in this document to re-house individuals experiencing homelessness currently sheltered in COVID-specific NCS, regardless the level of COVID-19 transmission.

Every community should begin implementing transition activities to re-house individuals experiencing homelessness. While COVID-specific NCS is an important piece of the system to prevent and mitigate the spread of COVID-19, stable, permanent housing provides the most cost-effective means to prevent and mitigate the spread of COVID-19 among people experiencing homelessness while also providing a platform to other positive health, educational, and economic

<sup>&</sup>lt;sup>1</sup> COVID-specific NCS is non-congregate shelter operated specifically in response to the COVID-19 pandemic to provide space for individuals and families to isolate and quarantine as necessary to prevent contracting or spreading COVID-19.

<sup>&</sup>lt;sup>2</sup> Interim Guidance on Duration of Isolation and Precautions for Adults with COVID-19 (cdc.gov)

outcomes that make maintaining housing easier. Further, there is currently an unprecedented amount of resources to house individuals and families experiencing homelessness. Therefore, communities should begin prioritizing identifying permanent housing options for these individuals experiencing homelessness sheltering in COVID-specific NCS.

Consistent with Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, HUD and FEMA encourage communities to "pursue a comprehensive approach to advancing equity for all," with "equity" being defined as "the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality."

#### **BACKGROUND**

The health risks of the COVID-19 pandemic to individuals and communities caused a medically based need for individuals to access safe, secure shelter in non-congregate settings to limit the spread of COVID-19. To mitigate these health risks, FEMA and HUD have been working together since the beginning of the pandemic to coordinate efforts to make effective and informed policy decisions, based on relevant CDC guidance. FEMA PA funded COVID-specific NCS is intended to provide isolation and quarantine as a necessary activity for communities during this COVID-19 public health emergency to save lives, protect property and public health, and ensure public safety. FEMA established criteria for the target population to be sheltered in COVID-specific NCS, based on CDC guidance. Individuals meeting the criteria below are considered eligible for NCS under the COVID-19 public health emergency, though in limited circumstances other individuals may be eligible based on specific State, Local, Tribal, and Territorial (SLTT) issued public health orders:

- Those who test positive for COVID-19 who do not require hospitalization but need isolation (including those exiting from hospitals);
- Those who have been exposed to COVID-19 who do not require hospitalization; and
- Asymptomatic high-risk individuals needing social distancing as a precautionary measure, such as people over 65 or with certain underlying health conditions (refer to CDC guidance, specifically the Table of Risk<sup>3</sup> list of applicable underlying health conditions).

Communities can use NCS to shelter individuals experiencing homelessness when the local public health order specifically requires it for the purpose of isolation and quarantine to protect public health and safety,<sup>4</sup> or for a limited period of time when individuals experiencing

<sup>&</sup>lt;sup>3</sup> <u>Science Brief: Evidence Used to Update the List of Underlying Medical Conditions That Increase a Person's Risk of Severe Illness from COVID-19</u>.

<sup>&</sup>lt;sup>4</sup> About Quarantine and Isolation I Quarantine and Isolation I CDC.

homelessness fit into one of the above populations due to the public health emergency (consistent with CDC guidance). For more information on COVID-specific NCS sheltering costs covered by FEMA, see the following guidance documents issued by FEMA:

- Fact Sheet: Public Assistance: Non-Congregate Sheltering Delegation of Authority;
- Frequently Asked Questions: Coronavirus (COVID-19) Pandemic: Non-Congregate Sheltering; and
- Memorandum for Regional Administrators, Update to Non-Congregate Sheltering Delegation of Authority Public Assistance Program and Policy Guide Waiver, December 16, 2020.

Many of the resources provided below can also help with this effort, including funds available under the American Rescue Plan Act of 2021, such as Emergency Housing Vouchers and HOME Investment Partnership Program funding. When re-locating an individual to permanent housing is not possible, communities will need to find alternatives, including integrating these individuals into existing emergency shelters or, where needed, extending NCS with funds other than from FEMA (e.g., Emergency Solutions Grants (ESG) Program funds or HOME Investment Partnership Program funding). It is critical that communities make enough housing and sheltering options available to prevent individuals experiencing homelessness being sheltered in COVID-specific NCS from returning to unsheltered living situations.

## THE PATH FORWARD

Many communities are already making concentrated efforts to house individuals experiencing homelessness in permanent housing following the strategies highlighted later in this document. For communities that haven't focused specifically on re-housing individuals experiencing homelessness sheltering in COVID-specific NCS-funded COVID-specific NCS, beginning this work now will ensure that there is a plan in place to re-house individuals from COVID-specific NCS utilizing the resources currently available from the CARES Act and the American Rescue Plan (ARP). These efforts should include connecting these individuals back to their own support systems (e.g., residing with family or friends), using their own resources (e.g., renting a room that they can afford on their own income), and providing government funded housing assistance (e.g., a Housing Choice Voucher (HCV) or Permanent Supportive Housing). More information about housing options available in your community can be found later in this document. Additionally, an overview of the funding resources to provide housing and wrap around supportive services to people experiencing homelessness, or at risk of homelessness, can be found in FEMA's COVID-19 Housing Resource Roadmap.

# **COVID-SPECIFIC NCS TRANSITION GUIDANCE**

1. What does transitioning an individual from FEMA Public Assistance (PA) funded COVID-specific NCS mean?

Transitioning an individual from FEMA PA funded COVID-specific NCS is the process of exiting people experiencing homelessness from the COVID-specific NCS to, whenever possible, stable housing.

As noted in the <u>Federal Funding Priority Order for Non-Congregate Shelter During COVID-19</u>, communities needed to develop transition plans for housing or otherwise sheltering individuals experiencing homelessness being sheltered in FEMA PA funded COVID-specific NCS. Communities need to have and implement a strategy so that people experiencing homelessness remain sheltered or are stably housed. This strategy should ensure that exits to unsheltered homelessness are avoided whenever possible and, ideally, all households are stably housed. Now is the time to implement those plans.

Housing individuals experiencing homelessness who are sheltering in COVID-specific NCS will require the coordination of numerous community resources and may require a housing surge to ensure everyone has access to permanent housing options. To effectively implement such a housing surge, communities will need to begin work at once to:

- <u>Identify Units</u>. Develop relationships with landlords to create access to enough units and prioritize resources to pay for these units (e.g., Rapid Re-Housing assistance paid for with ESG funds).
- <u>Identify Supportive Services</u>. Identify supportive service providers to provide wrap around services and help people move into and sustain housing.
- Engage People Experiencing Homelessness being Sheltered in COVID-specific NCS. Hire staff to work with individuals experiencing homelessness sheltering in NCS to determine the best housing options for them (including reconnecting with a resident's own support system).
- Gather Paperwork Necessary for Obtaining Housing. Although not items of eligible work for FEMA PA funding, case managers should begin working with people experiencing homelessness sheltering in COVID-specific NCS to gather the paperwork often needed to obtain housing (e.g., identification and vital records) and understand the barriers they may encounter in obtaining housing (e.g., criminal backgrounds, history of eviction, history of unpaid rent, lack of resources for a security deposit).

# 2. When should communities start preparing to re-house individuals experiencing homelessness from COVID-specific NCS?

Now.

There is currently no end date for FEMA reimbursement of COVID-specific NCS. As previously noted, FEMA will provide ample notice (not less than 60-days) to PA applicants once an end date for availability of COVID-specific NCS funding has been determined. FEMA continues to provide support to SLTT governments with COVID-specific NCS for the purpose of isolation and quarantine (as discussed above). FEMA is committed to continuing this support particularly as COVID-19 and emerging variants evolve and community risk varies across the country. FEMA's funding of COVID-specific NCS activities is intended to

support individuals who have tested positive for COVID-19 and need a safe, secure place for isolation and quarantine. FEMA is also continuing NCS support for those who are asymptomatic high-risk individuals with underlying heath conditions, per CDC guidance<sup>5</sup>.

Per FEMA guidance (referenced on page 3 of this document) sheltering in non-congregate shelters should be determined by a public health official's direction or in accordance with the direction or guidance of health officials by the appropriate state or local entities in alignment with CDC guidance.<sup>6</sup>

With the evolving nature of the pandemic, applicants for FEMA PA assistance are encouraged to keep in regular communication with their FEMA regional office to receive the most up to date guidance on FEMA funding for COVID-specific NCS.

Establishing and implementing procedures now to quickly move individual and households into permanent housing gives the community time to fully understand the workflows, barriers, and partnerships that will be required to successfully house all people experiencing homelessness who are transitioning out of COVID-specific NCS. It also allows communities to strategically utilize the resources from the CARES Act and the ARP.

PA Applicants should request reimbursement for COVID-specific NCS costs throughout NCS operations and should not wait until the final notification of funding eligibility to request reimbursement for all eligible costs.

For information on rapidly facilitating exits from NCS to permanent housing and community examples, see Rehousing Out of Non-Congregate Shelter: Maximizing Placements.

#### 3. What strategies should communities use to implement their transition strategy?

Many communities have been focused on keeping people safe and preventing the spread of COVID-19. However, preparing and implementing actions to transition individuals out of COVID-specific NCS will involve ramping up efforts to house individuals experiencing homelessness sheltering in COVID-specific NCS. Communities should begin (or increase their efforts toward) implementing the following strategies:

Center racial equity in the process. Ensure, up front, that efforts to transition away from COVID-specific NCS do not perpetuate existing racial inequities, by centering racial equity in the planning. Embedding principles of equity in transition planning and implementation also creates an opportunity in communities to move energy and resources to those most impacted by both deep poverty and high rates of COVID-19 cases, and to provide equitable access to needed resources to achieve equitable outcomes. Centering racial equity in the process includes providing voice to underserved communities, such as Black, Latino, Indigenous and Native American persons, Asian Americans and Pacific

<sup>&</sup>lt;sup>5</sup> Certain Medical Conditions and Risk for Severe COVID-19 Illness | CDC

<sup>&</sup>lt;sup>6</sup> Interim Guidance for Homeless Service Providers to Plan and Respond to Coronavirus Disease 2019 (COVID-19) | CDC

Islanders and other persons of color, and people with lived experience of homelessness, at planning tables. Additionally, centering racial equity includes establishing specific data metrics to track re-housing efforts and ensure that people served in NCS are re-housed in a manner that minimizes racial inequity in outcomes. Centering equity means understanding the racial and ethnic makeup of people living in NCS, understanding historical inequities and barriers faced by persons in such groups, and ensuring that the housing strategy out of NCS does not deepen inequities in housing and health outcomes in the community. For example, if there are racial inequities in the population in NCS compared to people experiencing unsheltered homelessness or sheltering in congregate shelters, prioritizing people exiting NCS over other people experiencing homelessness will deepen racial inequity. Additional information about centering equity in the housing process can be found at Homeless System Response: 5 Tips to Approaching Rehousing with Racial Equity.

- Get to know the people living in NCS. Understand the needs and resources of individuals experiencing homelessness sheltering in NCS. Determine who can be housed with family or friends, who can afford an unassisted unit with a roommate(s), who can resolve their homelessness with minimal assistance, and who will need longer-term housing assistance (e.g., Permanent Supportive Housing). This will likely involve implementing housing problem-solving approaches. For examples of how communities have implemented and funded housing problem solving, review Homeless System Response: Housing Problem-Solving in Practice.
- Obtain documentation needed to move into housing. Landlords often require certain documents to obtain housing (e.g., driver's licenses, income statements, etc.). In many places, COVID-19 has made the processes for obtaining these documents longer and more challenging, especially for underserved communities such as Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color. Provide assistance with obtaining the above referenced documents now so individuals will be ready to move into housing when they identify a unit.
- Recruit landlords. An abundance of resources, primarily for rental assistance, are coming online as a result of COVID-19 and the resulting economic crisis. The money can only be spent, though, if there are enough landlords willing to accept housing vouchers for people experiencing homelessness and there is an adequate supply of accessible housing available. Begin recruiting landlords now so that the units are ready to come online before COVID-specific NCS concludes. HUD has published numerous resources on recruiting landlords, which can be found here. It is critical that communities partner with a diverse range of local landlords to ensure the transition plan is rooted in equity-based decisions.
- Identify resources to pay for housing. Most people experiencing homelessness sheltering in COVID-specific NCS will need at least some resources as they exit COVID-specific NCS into permanent housing, whether in the form of services (e.g., case management, housing search and navigation services, mediation), minimal financial assistance (e.g., security or utility deposits, first month's rent), or ongoing housing assistance (e.g., Rapid Re-Rousing assistance or Permanent Supportive Housing). Communities will need to have identified resources in place to cover the breadth of these needs. Several possible federal resources have been identified later in this document, but communities should also consider other resources, such as general funds or foundation funding.

- <u>Prioritize people for housing resources</u>. Prioritizing people for housing resources is a matching exercise the community will engage in once the needs and resources of individuals experiencing homelessness sheltering in COVID-specific NCS have been identified, and the resources available for housing them have been identified. Very likely, there will not be enough resources to provide ongoing housing assistance for everyone experiencing homelessness sheltering in COVID-specific NCS; therefore, a community will have to prioritize matching those most vulnerable to the appropriate housing resources. This should be done in consideration with the rest of the homelessness system using a coordinated rehousing strategy. The majority of the resources dedicated for individuals experiencing homelessness is assigned through the Continuum of Care (CoC) Program's coordinated entry. Communities should ensure that all households experiencing homelessness in who are sheltering at COVID-specific NCS sites are assessed by coordinated entry, and should begin housing problem solving conversations with any household that will not be prioritized for ongoing assistance in order to identify other housing options. A CoC might need to make temporary changes to its coordinated entry's prioritization policies to house those who have sheltered in COVID-specific NCS.
- Provide housing search and navigation services. Even when someone can afford housing on their own, navigating the private rental market can be challenging. Providing assistance to individuals with housing search related activities (e.g., searching for and applying for affordable units, viewing units, helping to find accessible dwelling units, understanding rental agreements, etc.) can help house individuals in permanent housing. A community can provide housing search and navigation services in one of three ways centralized, single function; decentralized, single function; or decentralized, multiple function each of which has benefits and drawbacks. Review these resources for more information about each of the models and to determine which model might work best for the purpose of housing individuals experiencing homelessness in COVID-specific NCS, which may be the same way your community approaches normal housing efforts, or may be different.
- Connect individuals with wrap around supportive services to help them maintain housing. In additional to housing search and navigation services, many individuals experiencing homelessness will require ongoing supportive services to help them maintain housing. Seek a diverse range of supportive services by partnering with a diverse range of partners, including organizations trusted by people experiencing homelessness. While some funding streams provide wrap around supportive services as part of the program design (e.g., CoC Program Permanent Supportive Housing), the majority of individuals will need help connecting to mainstream supportive services (e.g., healthcare, food, employment, education). In preparation for exiting COVID-specific NCS, individuals should be assessed for their eligibility for benefits and provided assistance in enrolling for the benefits for which they are eligible.

The National Mass Care Strategy website offers additional information and strategies to aid in transitioning individuals out of emergency sheltering that can be adapted for COVID-

<sup>&</sup>lt;sup>7</sup> A CoC is a local planning body responsible for coordinating the full range of homelessness services in a geographic area, which may cover a city, county, metropolitan area, or an entire State.

specific NCS; they may be found on the website in <u>Appendix F: Transition to Alternate Sheltering and Housing Solutions Considerations</u>.

- 4. What are some promising practices that other communities have used to transition households experiencing homelessness from NCS to other locations?
  - On February 26, 2021, representatives from New Orleans, LA presented on HUD's COVID-19 Planning and Response for Homeless Assistance Providers Office Hours about their strategy to keep individuals experiencing homelessness safe from COVID-19 by providing NCS and subsequently housing them in permanent housing. The recording can be accessed <a href="here">here</a>.
  - On May 7, 2021, representatives from Clackamas County, OR presenting on HUD's COVID-19 Planning and Response for Homeless Assistance Providers Office Hours about their strategy to re-house individuals sheltering in NCS. The recording can be accessed here.

HUD will continue to publish examples of communities' re-housing strategies at https://www.hudexchange.info/homelessness-assistance/diseases/.

- 5. What resources are available to help communities house individuals experiencing homelessness exiting COVID-specific NCS?
  - Continuum of Care (CoC) Program. The CoC Program is a competitive program designed to promote communitywide commitment to the goal of ending homelessness. It provides funding for Permanent Supportive Housing (PSH), Rapid Re-Housing, transitional housing, supportive services to help people experiencing homelessness obtain and maintain housing (including street outreach), and Homelessness Management Information System (HMIS). Funding is provided to nonprofit providers, and State and local governments.
  - ESG Program. The ESG Program is a formula program that provides funding for street outreach, emergency shelter activities, Rapid Re-Housing, Homelessness Prevention, and HMIS. Funding is awarded to States, metropolitan cities, urban counties, and U.S. Territories. The CARES Act provided \$4 billion to the ESG Program, known as ESG-CV funding, which funds the traditional ESG activities as well as contains additional eligible activities and flexibilities to help communities better prevent, prepare for, and respond to coronavirus amongst individuals and families experiencing and at risk of homelessness.
  - Housing Opportunities for Persons with AIDS (HOPWA) Program. The HOPWA Program provides housing assistance and supportive services to low-income persons living with HIV and their families. Funds can be used for rental assistance, short-term rent, mortgage and utilities, permanent housing placement, housing information services, case management and other supportive services. The HOPWA Program provides formula and competitive funding to States, local governments, and nonprofits. The CARES Act provided an additional \$65 million in funding to the HOPWA Program.
  - Coronavirus Relief Fund (CRF). Awarded through the CARES Act, CRF funds can be used to cover expenses that are necessary expenditures incurred due to the public health

- emergency with respect to COVID-19. Funds were awarded to States and eligible units of local government, the District of Columbia and U.S. Territories, and Tribal governments.
- Emergency Rental Assistance (ERA). More than \$45 billion in emergency rental assistance, administered by the Department of the Treasury has been awarded through the Consolidated Appropriations Act, 2021 and the American Rescue Plan, to help millions of families keep up on their rent and remain in their homes. ERA funds can be used to assist households that are unable to pay rent and utilities due to COVID-19. The funds are provided to States, U.S. Territories, local governments, and Indian Tribes.
- Mainstream Vouchers. Mainstream vouchers are generally awarded competitively to public housing agencies (PHAs) to assist non-elderly persons with disabilities with a long-term housing voucher. The CARES Act provided a non-competitive allocation of Mainstream vouchers to PHAs that were awarded such vouchers through the FY 2017 and/or the FY 2019 Mainstream Voucher Notice of Funding and Availability. PHAs can create preferences to target resources to people experiencing homelessness and/or people moving on from Permanent Supportive Housing, which opens up space in Permanent Supportive Housing to house people experiencing homelessness.
- Housing Choice Voucher (HCV) Program. HCVs are renewed noncompetitively to PHAs to assist very low-income families, the elderly, and individuals with disabilities to afford decent, safe, and sanitary housing in the private market. The program provides long-term housing vouchers to individuals and families who then are able to choose any housing that meets the requirements of the program. As with Mainstream vouchers, PHAs can create homeless or Moving On preferences to increase access to resources for people exiting NCS.
- <u>Supportive Services for Veteran Families (SSVF)</u>. SSVF funding is awarded competitively to nonprofit agencies and consumer cooperatives. The funding provides time limited rental assistance, case management, and supportive services to prevent the imminent loss of a veteran's home, to identify a new home for veterans and their families who will imminently lose their home, and to rapidly re-house veterans and their families who are homeless.
- <u>HUD-VASH</u>. HUD-VASH vouchers are awarded noncompetitively to PHAs and U.S. Department of Veterans Affairs (VA) medical centers. The program combines HUD's HCVs with VA supportive services to help veterans who are homeless and their families find and sustain permanent housing.
- <u>Public Housing</u>. Public Housing programs, operated by PHAs, offer site-based affordable
  housing for low-income families. PHAs can create preferences to target Public Housing
  to people experiencing homelessness and/or moving on from Permanent Supportive
  Housing.
- <u>HOME Investment Partnerships Program</u>. The HOME Investment Partnership Program is a formula program awarded to participating jurisdictions (generally States and local governments) that provides funding for a wide range of activities including building, buying, and rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people.
- <u>Community Development Block Grant (CDBG) Program</u>. The CDBG Program is a formula program awarded to States, metropolitan cities, urban counties, and U.S. Territories that provides funding for a wide range of activities including housing rehabilitation for rent or homeownership, a wide range of public services including job

training and optional relocation assistance, and public facilities. The CARES Act provided \$5 billion to the CDBG Program, known as <a href="CDBG-CV funding">CDBG-CV funding</a> which provides funding for public service activities, housing-related activities, public improvements and facilities, activities to acquire real property, economic development activities, and general administrative and planning activities.

- Multifamily Programs. Multifamily Housing is a type of affordable housing in which a private property owner receives HUD funds in exchange for making some or all of their units affordable for low- or moderate-income households, and in some cases for special populations. Examples include the HUD Section 202 and Section 811 programs, which provide affordable housing and voluntary support services for the elderly and persons with disabilities. Multifamily properties can amend their Tenant Selection Plan to include preferences for people experiencing homelessness and/or moving on from Permanent Supportive Housing.
- American Rescue Plan Act of 2021. This legislation awarded \$5 billion in Emergency Housing Vouchers under the HCV Program and \$5 billion to the HOME Investment Partnership Program to create NCS, housing, and provide tenant-based rental assistance. Both programs are targeted to individuals experiencing homelessness; at risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and individuals who were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having risk of housing instability. Additionally, the legislation awarded \$350 billion in Coronavirus State and Local Fiscal Recovery Funds to state, local, territorial, and tribal governments to support public health expenditures; address negative economic impacts caused by the public health emergency; replace lost public sector revenue; provide premium pay for essential workers; and invest in water, sewer, and broadband infrastructure.

# 6. What happens if there is not enough permanent housing available for everyone sheltering in COVID-specific NCS?

Where permanent housing is not immediately available for individuals in COVID-specific NCS, communities need to immediately do everything in their power to keep people from exiting to unsheltered locations. This means integrating individuals into the current emergency shelter system or implementing new sheltering strategies as quickly as possible. Communities should follow the orders of funding priority for COVID-specific NCS published in the Federal Funding Priority Order for Non-Congregate Shelter During COVID-19 to continue to fund existing COVID-specific NCS.

# 7. Who should be involved in the transition away from COVID-specific NCS in our community?

Convening partners in the development and implementation of your community's NCS transition strategy will be critically important to its success. Each community will have partners unique to their homelessness response system, but at a minimum the following partners should be involved:

- The Continuum of Care (CoC). The CoC is responsible for having and implementing a plan to prevent and end homelessness across its geographic area. Including the CoC will ensure the strategy to house individuals from COVID-specific NCS is aligned with the broader strategy of the CoC, that coordinated entry policies and procedures can be updated as necessary, and that the CoC can track data to ensure housing placements are stable and the housing response is equitable. Find your local CoC here.
- Housing Funders. At a minimum, this should include PHAs, recipients of ESG funds, recipients of HOPWA funds, recipients of HOME funds, and SSVF providers, as these organizations will have access to federal funds that can be used to house individuals and families experiencing homelessness. But this should also include other organizations that fund housing locally. Bringing these providers into the process can help to ensure the availability of resources, and that eligibility criteria and access can be aligned where appropriate. Contact information for recipients of ESG, CoC, HOPWA, and HOME funded housing providers can be found here. Contact information for PHAs can be found here.
- <u>Supportive Service Funders</u>. Communities should include other State and local services
  (e.g., Medicaid, TANF, SNAP) to make sure supportive services are available to help
  individuals maintain stability in housing after exiting NCS. Engaging these partners up
  front will maximize eligibility and ensure the process for applying for benefits is clear,
  and can help to streamline application requirements and prioritize resources for people
  exiting NCS.
- People Sheltering in NCS. Individuals sheltering in NCS, or who were sheltered in NCS but have exited and are either currently residing in housing or continue to experience homelessness, have some of the best understanding of what strategies will most effectively result in housing success for those currently sheltering in NCS. Including them in your planning process will ensure these solutions are elevated to funders and providers for consideration. Resources to help communities engage individuals with lived experience in the planning process can be found here.
- Emergency Management (EM) Authorities. State and local EM authorities are responsible for managing and supporting federal Major Disaster Declarations, activating and assigning resources for jurisdictional emergency declarations, and sustaining their jurisdiction's capability to meet emerging events. They contribute situational awareness, operational tempo, and an expertise with Incident Command System that will be necessary for success. The development of collaborative intra-jurisdictional relationships will assist partners to more effectively respond and recover from disasters, both COVID-19 and on an ongoing basis.
- FEMA Regional Offices. FEMA regional offices will have the most up to date information related to your community about FEMAs timeline for PA funding/reimbursement for COVID-specific NCS. The time to begin providing a transition to sustainable housing for individuals exiting out of COVID-specific NCS is now, and the timeframe is critical for planning and implementing the housing surge and determining how to apply other resources (e.g., ESG-CV funding) as necessary to support an individual's transition out of NCS. FEMA regional offices typically work with PA eligible recipients and applicants for FEMA reimbursement. To contact your FEMA regional office refer to: Regions | FEMA.gov

- Housing and Homeless Service Providers. Local housing and homeless service providers
  have experience housing people experiencing homelessness locally, as well as providing
  wrap around supportive services to help individuals experiencing homelessness maintain
  housing. Including them in your planning process will ensure strategies that have
  effectively resulted in people experiencing homelessness obtaining stable housing are
  elevated and considered during the planning.
- American Red Cross (ARC). In addition to co-managing the National Mass Care Strategy with FEMA, ARC-National Headquarters (NHQ) are Emergency Support Function #6 subject matter experts and assist in managing sheltering policies, which includes NCS. Developing practices and procedures for effectively transitioning people experiencing homelessness out of NCS is an essential component of a successful activation strategy. Collaboration between local ARC chapters and NHQ will assist local efforts to develop housing placement skills and knowledge, serve households with complex needs, and strengthen resilience by expanding the pool of knowledgeable local teams that can assist with re-housing individuals experiencing homelessness from NCS. Find your local ARC chapter here.
- Other Voluntary Organizations Active in Disasters (VOAD). Local VOADs have experience providing and managing resources for unmet needs after a major disaster. Frequently, resolving these unmet needs requires convening local partners, defining barriers, and identifying solutions. Their role in organizing community resources combined with experience providing casework to disaster survivors makes them ideal partners in this stage of recovery from COVID-19. More information about VOADs can be found <a href="here">here</a>; however, to identify your local partners contact your local emergency management authorities.

## CONCLUSION

The CARES Act and the American Rescue Plan Act of 2021 offer unprecedented federal resources to help people experiencing homelessness. Communities will have many responsibilities and challenges to housing people experiencing homelessness and ensuring that as people exit COVID-specific NCS they are supported with the resources needed to obtain and maintain housing. The tools and strategies identified in this document, and through other technical assistance, will help communities accomplish these goals.

HUD and FEMA deeply appreciate the incredible work community leaders, providers, and other stakeholders have done to keep people experiencing homelessness safe throughout the pandemic.