Maximizing Funding for Non-Congregate Shelter Opportunities:
California’s Project Roomkey

April 23, 2020
12:00pm-1:30pm ET
Webinar Format

- 90 minute webinar
- Approximately 20-25 minutes for questions
- Use the question and answer feature at any time – we will get to as many as we can during Q&A at the end of the webinar
- If you are having technical difficulties, try exiting the webinar and logging back in
- For resources and answers to more specific questions, visit the USICH COVID-19 page and/or use the HUD Exchange Ask-A-Question (AAQ) Portal

This webinar will be recorded and posted to www.usich.gov within 2-3 days.
Webinar Agenda

• USICH Overview
• Federal Partners
  • HUD: Kim Nash, Region IX Community Planning & Development Director
  • FEMA Region IX: Clare Francavilla, Operations Branch Director – Mass Care and JR Heimbecker, Emergency Management Specialist
  • VA: Jill Albanese, Deputy Director, SSVF
• State of California and Alameda County
  • Corrin Buchanan, Assistant Director of Housing and Homelessness, California Department of Social Services
  • Dr. Kathleen Clanon, Director, Alameda County Care Connect – Alameda County Health Care Services Agency
• Moderated Q&A
• Wrap-up
CPD CARES Act Overview
Kimberly Nash

SF CPD Director– NorCal, AZ, & NV
April 23, 2020
CDBG-CV CARES Act

• Enacted March 27, 2020
• Provides $5 billion for CDBG coronavirus grants
  – $2 billion using FY2020 formula announced April 2
  – $1 billion under new formula for States and insular areas by May 11
  – $2 billion under new formula on rolling basis based on needs
• All CDBG-CV activities must prepare, prevent, respond to coronavirus
Eligible Activities for Infectious Disease Response

• Buildings and Improvements, Including Public Facilities
  • Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements
  • Rehabilitation of buildings and improvements
• Assistance to Businesses, including Special Economic Development Assistance
  • Provision of assistance to private, for-profit entities, and microenterprises when appropriate to carry out an economic development project
Eligible Activities for Infectious Disease Response (cont.)

- Provision of new or quantifiably increased public services
- Planning, Capacity Building, and Technical Assistance
  - Grant funds to units of general local government may be used for planning activities in conjunction with an activity, planning only as an activity AND to support TA and capacity building on the state level
  - Gather data and develop non-project specific emergency infectious disease response plans to entitlements
CDBG-CV High Level Notes

• Provides CDBG grantees with flexibilities that make it easier to use CDBG-CV grants and fiscal years 2019 and 2020 CDBG Grants for coronavirus response and authorizes HUD to grant waivers and alternative requirements.

• Requires CDBG-CV grantees to prevent the duplication of benefits, which means grant funds cannot be used to pay costs if another source of financial assistance is available to pay that cost.
Public Services Cap Suspended

- CARES Act suspends public services cap for CDBG-CV, FY2020 and FY2019 grants

- For FY19 and 20 grants, all amounts over 15% must be to prepare, prevent, or respond to coronavirus

- Public services and capacity building do not include general conduct of government or general operating for subrecipients
  - Fund an activity, not the entity
Reimbursement of Costs

• Grantees may use CDBG-CV grant funds to cover or reimburse costs to prevent, prepare for, and respond to coronavirus incurred by a State or locality, regardless of the date on which such costs were incurred, when those costs comply with CDBG requirements.

• For other grants, pre-agreement and pre-award cost authority is available under 24 CFR 570.489(b) (states) and 570.200(h) (entitlements).
Plan Deadlines and Citizen Participation

• Extends the deadline for grantees to submit action plans and consolidated plans for fiscal years 2019 and 2020 to August 16, 2021.

• Grantees may amend citizen participation plans to establish expedited procedures to draft, propose, or amend consolidated plans.
• Authorizes the Secretary to issue statutory and regulatory waivers/alternative requirements for CDBG-CV and some CDBG funds when necessary to expedite or facilitate the use of grant funds to prevent, prepare for, and respond to coronavirus.

• Prohibits waivers/alternative requirements related to fair housing, nondiscrimination, labor standards, and the environment.

• HUD has additional regulatory waiver and statutory suspension authorities.
MEGA-Waiver


Waivers of Community Planning and Development Grant Program and Consolidated Plan Requirements to Prevent the Spread of COVID-19 and Mitigate Economic Impacts

Waiver Process and Recordkeeping Requirements:

- Grantee should email notification to the attention of CPD Director Kimberly Nash at CPD_COVID-19WaiverCPD@hud.gov.
- The email notification must be sent 10 business days before the grantee anticipates using the waiver.
- In addition to the summarized justifications provided under each waiver section below, grantees MUST update their program records to include written documentation of the specific conditions that justify the recipient’s use of the waiver, consistent with the justifications and applicability provisions provided in the COVID-19 Waiver Memorandum.
- Provisions that are not specifically waived remain in full effect.

Required Information (complete all fields):

- Entity Type:
- Recipient Name and Title:
- Phone/Number:
- Email/Address:
- Declared disaster area(s) where the waiver will be used:
- Date on which the grantee anticipates first use of the waiver flexibility:

Grantees will utilize the following waiver flexibility (select all that apply):

- ESQ Programs:
- RISE Lead Activities
- Re-examinations for Homelessness Prevention Assistance
- Housing Stability Case Management
- Restriction of Rental Assistance to Units with Rent at or Below FAIR

- Description supporting request for the waiver (optional):

- HOPEA Program:
- Self-Certification of Income and Credit Information on HEV Status
- FAIR Rent Standards
- Property Standards for TRA
- Space and Security

- Description supporting request for the waiver (optional):

- HOME, CDBG, HUD ESQ, and HOPEA Programs Consolidated Planning Requirements:
- Citizen Participation: Public Comment Period for Consolidated Plan Amendment
- Citizen Participation: Reasonable Notice and Opportunity to Comment

- Description supporting request for the waiver (optional):
• $4 Billion for Emergency Solutions Grants Program funding
• SNAPS will issue a notice to further define program requirements
• No Emergency Shelter/Street Outreach cap
• Increase of admin from 7.5% to 10%
• Increase of income limit from 30% to 50% AMI for Homelessness Prevention component
• Eliminates matching requirement
• Allows deviation from applicable procurement standards when procuring goods and services to prevent, prepare for, and respond to coronavirus

• Prohibits using any funds to require people experiencing homelessness to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services

• No citizen participation or consultation requirements

• No minimum period of use for emergency shelters
### HOPWA CARES Act

<table>
<thead>
<tr>
<th>Provision</th>
<th>Amount</th>
<th>Method</th>
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<tbody>
<tr>
<td>For an additional amount for carrying out the “Housing Opportunities for Persons with AIDS” program, as authorized by the AIDS Housing Opportunity Act (42 U.S.C. 12901 et seq.), $65,000,000, ...</td>
<td></td>
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<td>Provided, That not less than $50,000,000 of the amount provided under this heading in this Act shall be allocated pursuant to the formula in section 854 of such Act using the same data elements as utilized pursuant to that same formula in fiscal year 2020: Provided further,</td>
<td>$53,700,000</td>
<td>Allocate immediately using 2020 formula</td>
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<td>That up to $10,000,000 of the amount provided under this heading in this Act shall be to provide an additional one-time, nonrenewable award to grantees currently administering existing contracts for permanent supportive housing that initially were funded under section 854(c)(5) of such Act ... Provided further, That such awards shall be made proportionally to their existing grants:</td>
<td>$10,000,000</td>
<td>Allocate immediately proportional to existing grant amounts</td>
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<tr>
<td>That up to 2 percent of amounts made available under this heading in this Act may be used, without competition, to increase prior awards made to existing technical assistance providers</td>
<td>$1,300,000</td>
<td>Provide to existing Technical Assistance providers</td>
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HOME CARES Act

• Statutory Suspensions and Regulatory Waivers Available Only to Participating Jurisdictions with Major Disaster Areas as a Result of COVID-19
  • 10% Administration and Planning Cap
  • CHDO Set-aside Requirement
  • Limits and Conditions on CHDO Operating Expense Assistance
  • Consolidated Plan – HOME Certification, Analysis of Local Market Conditions, and Citizen Participation

• Regulatory Waivers Available to All Participating Jurisdictions
  • Citizen Participation Reasonable Notice and Opportunity to Comment
  • Income Documentation
  • On-Site Inspections of HOME-assisted Rental Housing
  • Four-Year Project Completion Requirement
  • Nine-Month Deadline for Sale of Homebuyer
Tenant-Based Rental Assistance (TBRA) CARES Act

- $1.25 billion for TBRA operating assistance to public housing agencies to maintain normal operations and take other necessary actions during the period that the program is impacted by coronavirus.

- Funding will cover a combination of administrative costs, expenses to support and maintain the health and safety of assisted households, and to retain and support participating landlords and to adjust renewal funding for voucher costs.

- Distribution of Funds: The funds will be distributed based on need, as determined by HUD.
Questions and Resources

• [CPDQuestionsAnswered@hud.gov](https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-key-resources)

• The Ask A Question desk: [https://www.hudexchange.info/program-support/my-question/](https://www.hudexchange.info/program-support/my-question/)

• [https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-key-resources](https://www.hudexchange.info/homelessness-assistance/diseases/#covid-19-key-resources)
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Key Considerations and Guidance

• FEMA’s Public Assistance Program is the division that coordinates reimbursement funding to local communities and states that provide services during a disaster.

• COVID-19 is different than other Public Assistance Programs in that this incident covers the entire nation, rather than being isolated after a specific disaster event.
Tips to Maximize FEMA Reimbursement Opportunities

• Connect with Your Local & State Office of Emergency Services Department
• Ask Questions
• Documentation is Key
Connect with Your Local & State Office of Emergency Services Department

- FEMA’s application process typically goes through the State Office of Emergency Services (OES) Department.
- Imperative for local service providers to coordinate with their county or state emergency management department as they can provide guidance about local and statewide regulations and processes.
Ask Questions

- Better to ask about and apply for funding and then find out that your request is not applicable than not apply at all.
- Be proactive with your questions. The question that is unasked may be the one that causes the problems.
Documentation is Key

- FEMA reimbursement funds are a source of **last resort**. FEMA fills gaps that are not available through other funding opportunities and **no duplication of benefits** are permitted.
- Documentation includes receipts for services and supplies, as well as timesheets.
- **Keep all itemized receipts and categorize by funding source:**
  - FEMA is going to review **everything** a provider has received and where that funding originated.
  - The **more organized** your documentation the **faster and easier** to determine level of FEMA reimbursement available to you.
• SSVF program provides Rapid Rehousing and Homelessness Prevention to Veterans.

• 271 SSVF programs are located in all 50 states, PR, VI, and Guam.

• SSVF grantees are located throughout CA providing complete coverage except in some very remote areas.

• $95,060,168 allocated to CA SSVF programs in FY2020
• In February, SSVF program recognized urgent need to expand emergency housing services in response to COVID-19.

• SSVF requested additional flexibility in authority to provide emergency housing (hotels) to vulnerable Veterans living unsheltered or in congregate settings.

• On March 17, SSVF began nationwide effort to expand emergency housing to vulnerable Veterans.
• VA data indicated that 62% of homeless Veterans enrolled in VA program meet vulnerability criteria (over age 60 and high-risk).

• Unsheltered Veterans are additional target population for SSVF emergency housing assistance.

• Veterans needing to self-quarantine prior to entering VA homeless programs are also eligible for hotel stays.
• SSVF Program Office provided guidance on increased flexibility to grantees in March.

• Grantees used existing network of hotel partners to provide services and began building capacity quickly.

Staff from SSVF provider, Berkley Food and Housing Project stand outside a local hotel. SSVF provides hotel rooms for Vulnerable Veterans. (photo courtesy of BFHP)
• SSVF services will vary, but all Veterans need some level of support when placed in hotels.
  – SSVF grantees provide ongoing support to assess needs of Veterans
  – Food Assistance is allowable and may be needed by some Veterans who have been placed in hotels
  – Plans are established to connect Veterans to medical care, as needed
  – Negotiation with hotels is allowable, if needed, to provide some services, such as laundry or meals
• Goal of SSVF is to move Veterans from hotels to permanent housing through Rapid Rehousing.

• Supplemental CARES funding provided to expand emergency housing and assist with Rapid Rehousing efforts.

• No current time limit on hotels to provide grantees time to secure permanent housing.
• SSVF grantees are encouraged to align planning efforts with VA, CoC, and community to coordinate efforts and maximize resources.

• SSVF Emergency housing assistance can also be used in diversion efforts to support host families when Veterans are diverted from shelter to stay with family or friends.
• Program Office provides ongoing national guidance to grantees and support through Regional Coordinators and technical assistance providers.

• SSVF providers and SSVF Program Office staff solve problems and address barriers quickly.

• Data is being collected through HMIS and through other reporting methods.
Project Roomkey:
California Effort to Protect People who are Homeless in the COVID-19 Response

Corrin Buchanan, Assistant Director of Housing and Homelessness, California Department of Social Services
Project Roomkey

- Locally driven, State supported initiative that was created to provide emergency housing in hotels/motels/trailers for sick and medically vulnerable individuals experiencing homelessness in response to COVID-19
- Mission is to mitigate transmission, reduce hospital surge, and protect lives
- Goal of 15,000 units
- $150M in state funding made available to support COVID-19 response for people experiencing homelessness

Photo by Michael Owen Baker/Los Angeles County
State role

• In addition to funding the effort, various State agencies provide on-going public health guidance, training materials, master agreement for wrap-around services, technical assistance in emergency operations

• Hotel/motel identification and occupancy agreement negotiation

• Support the connection to essential behavioral health and health care services including telehealth

• Ensure deployment of resources match the need of counties with significant homeless populations that are also experiencing high concentrations of COVID-19 transmission
FEMA Approval of Non-Congregate Shelter

• California made a request for FEMA Public Assistance on March 25, 2020
• State received approval on March 27, 2020
• California was the first state to obtain approval from FEMA to provide non-congregate housing alternatives for people with unstable housing who may need to quarantine in response to COVID-19
FEMA reimbursement

• 75% FEMA reimbursement to state or local government
• Non-congregate shelter and wrap around services directly necessary for the safe and secure operation of facilities are reimbursable
• Case management and behavioral health services not reimbursable
• Approval though April 30, 2020, with opportunity to request extension
• Must maintain tracking mechanism to provide sufficient data and documentation to establish eligibility - plan to use HMIS
Populations served through FEMA assistance

1. Individuals who test positive for COVID-19 that do not require hospitalization, but need isolation or quarantine (including those exiting from hospitals);

2. Individuals who have been exposed to COVID-19 (as documented by a state or local public health official, or medical health professional) that do not require hospitalization, but need isolation or quarantine; and

3. Individuals who are asymptomatic, but are at “high-risk,” such as people over 65 or who have certain underlying health conditions (respiratory, compromised immunities, chronic disease), and who require Emergency NCS as a social distancing measure.
Rationale for FEMA approval

• Individuals lacking stable housing are more likely to use hospital emergency rooms.

• Patients experiencing homelessness are admitted to inpatient units 5 times more often than people who have stable housing.

• Protecting individuals experiencing homelessness will relieve pressure on the hospital system by separating high-risk individuals who are homeless from COVID-positive or persons under investigation (PUI), in order to protect public health and safety for the duration of this public health emergency.
Providing on-going housing support to Project Roomkey clients post-crisis

• Goal is to provide on-going housing support to individual after the crisis

• State exploring opportunities to support counties that wish to purchase hotel and motels for conversion to permanent supportive housing
Guidance to other states

• Ensure emergency response systems prioritize people experiencing homelessness and that responses are guided by public health lens
• Invest in a broad hotel/motel outreach and negotiation strategy
• Include homeless service providers in the operations of the housing settings
• Be prepared to tackle issues related to PPE and workforce shortages
• Have a streamlined strategy for who moves in to hotel rooms
• Don’t lose sight of opportunities for permanent housing
USICH webinar: Standing Up Isolation Housing

Kathleen A. Clanon, MD
Medical Director, Alameda County Health Care Services Agency
Why Us?

- **8,022*** unsheltered in Alameda County
- 35+ shelters and numerous large encampments
- 14 cities, including Oakland, Berkeley

*Homelessness PIT Count & Survey 2019
Two Hotels

Comfort Inn (Operation Comfort)
- 100 rooms
- Isolation/Quarantine

Hotel Radisson (Operation Safer Ground)
- 290 rooms
- Medically fragile and 65+
Operational Decisions

• How to transport safely
• How to protect hotel staff, security, driver
• How far can we get in harm reduction design
• How to share info between housing/hospital/PHD/BH all without violating the law
Strategic Decisions

- Population mix (COVID+ vs Medically fragile)
- Who gets an invitation?
- Who gets to refer?
- Staffing
- Isolation rules
The Easter Pivot

- Slow accrual in Safer Ground
- 4/10 outbreak in SF shelter
- Reengineered our process in 18 hours
- 4/12 began doing screening at shelters- 10 shelters in 3 days

Screening at Berkeley Food and Housing
Looking Ahead

• More hotels – Operation Comfort style
• Supporting current guests
• Stabilizing staffing – from volunteers to DSWs
• Working on the longer term...
• Operation Comfort & Operation Safer Ground: Policy and Procedure Manual
• Flyer
• FAQs
• Operation Comfort referral training for providers – PowerPoint
• Operation Comfort online screening and referral form

• Welcome/Recruiting video for Operation Safer Ground (new link coming soon)
• Operation Safer Ground admissions form
• PPE training: https://www.youtube.com/watch?v=Bi_tXapx-hQ

Contact

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Housing Planning Lead
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Medical Lead
Dr. Kathleen Clanon
ACCareConnect@acgov.org
Q&A
Resources

• CDC and Guidance for Homeless Shelters
• USICH: COVID-19 resources
• Contact your USICH Regional Coordinator using our State Data and Contacts Map (click on your state to find your RC)