



DuPage County Continuum of Care COVID-19 Rehousing Response

The DuPage County Continuum of Care (CoC) seeks to mitigate the spread of COVID-19 among people experiencing homelessness by ensuring that as many individuals and families as possible are in safe, healthy homes where they can ensure social distancing and comply with isolation and quarantine guidelines as necessary. As DuPage County begins to implement the re-opening process, we wish to follow guidance provided by local public health officials as well as state and federal partners to assist in our efforts in setting goals that are achievable with available resources. CARES Act resources are designed to prevent the spread of COVID and to reduce the harm caused by COVID. The safest place for people to be during a public health crisis is in housing.

The DuPage County CoC has explored the implementation of adjustments to the way people access permanent housing (permanent supportive housing and rapid re-housing) with the goal of expediting housing placements as quickly as possible, and ensuring our system remains flexible as we work to house those experiencing homelessness in light of COVID-19.

Several of these adjustments are reflected in the outline provided below:

Provider Adjustments	System Adjustments
<p>Providers should begin to:</p> <ul style="list-style-type: none"> • Leverage available waivers to bypass regulatory requirements to house people quickly (i.e. disability documentation, FMR, etc.). • Waive any internal agency requirements to accessing housing units and document the changes being made. • Identify ways to connect to this system effort (ideas are outlined in Provider Next Steps below). • Continue to collect data to inform system analysis and response efforts 	<p>The CoC and other stakeholders will begin working on:</p> <ul style="list-style-type: none"> • Changing coordinated entry prioritization to temporarily allow for COVID conditions • Implementing the use of verbal client consent for Coordinated Entry System Release of Information • System-wide landlord engagement led by the Landlord Engagement Task Force. • Increasing the usage and flexibility of rapid re-housing. • Supporting efforts to reduce system-wide barriers to housing (i.e., documentation requirements).

These guidelines will be in effect during the COVID-19 health crisis. The DuPage County Health Department will determine the end of the COVID-19 health crisis for purposes of this policy.

DuPage County CoC COVID-19 Rehousing Policy

1. Continuum of Care homeless assistance programs will continue housing participants in

permanent and transitional housing programs. Providers must actively work, and demonstrate their efforts through working within the CES, to expedite housing placements.

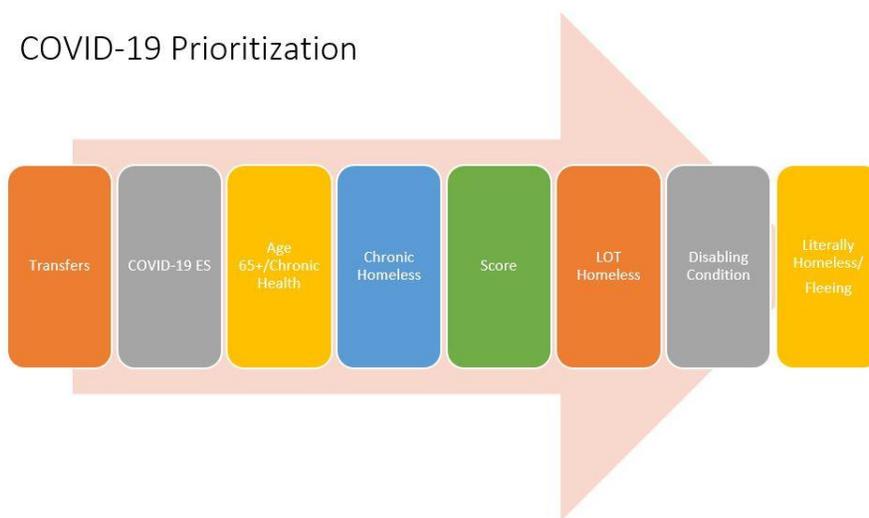
2. Housing providers will strive to remove barriers that impedes the rapid placement of participants in housing; housing providers will apply for applicable waivers that expedite the housing process. Housing providers will need to implement creative solutions and utilize technology to ensure housing continues, such as live streaming or video call for intakes, case management and housing inspections and/or utilizing electronic signatures.
3. The current Coordinated Entry Prioritization can be set aside so that the system can respond quickly and determine the best course of action to keep the homeless population as safe as possible. This could potentially mean that participants of the homeless system who are placed in emergency, quarantine or isolation housing or otherwise deemed at high-risk due to the COVID-19 health crisis will be prioritized for Permanent Housing (PH) programs (including both rapid rehousing, permanent supportive housing or other permanent housing types) to avoid moving back into shelter, other congregate living environments, to maintain self-quarantining or so they are not exited to/placed in unsheltered homelessness.

Next Steps for Providers

- CoC-funded providers should apply for HUD Waivers and implement emergency recordkeeping protocols. Waiver information is available on the HUD Exchange website:
<https://www.hudexchange.info/resource/6007/availability-of-waivers-of-community-cpd-grant-program-and-consolidated-plan-requirements-to-prevent-the-spread-of-covid19-and-mitigate-economic-impacts-caused-by-covid19/>
[https://www.hud.gov/sites/dfiles/CPD/documents/Additional Waivers for CPD Grant Programs to Prevent COVID-19 Spread and Mitigate COVID-19 Economic Impacts.pdf](https://www.hud.gov/sites/dfiles/CPD/documents/Additional_Waivers_for_CPD_Grant_Programs_to_Prevent_COVID-19_Spread_and_Mitigate_COVID-19_Economic_Impacts.pdf)
Emergency record keeping protocols should be in accordance with 24 CFR 578.103(a), and ensure that Continuum of Care program funds are used to comply with the requirements of 24 CFR 578, and that sufficient records will be maintained to enable HUD to determine requirements are met.
- Identify the organizational process regarding how people get into RRH and PSH and explore ways the process can be expedited or improved.
- Track and document the updates to internal procedures made to align with this rehousing response.
- Remain involved in the DuPage County Continuum of Care with active participation on a committee. Stay in close communication with the DuPage Continuum of Care at continuum@dupageco.org regarding ideas, questions or concerns.

Next Steps for the DuPage County CoC

- Develop coordinated entry prioritization utilizing health and safety protocol guidance from local public health officials to ensure the unique needs and opportunities related to the homeless service system are incorporated, particularly those at high risk of developing severe COVID-19 symptoms (those 65+ and people of all ages with underlying medical conditions, per the CDC). Implement changes to further protect and prioritize families and individuals experiencing homelessness as a result of COVID-19 impacts into permanent housing.



- Implement the use of COVID-19 temporary procedures for obtaining verbal consent. To minimize exposure to COVID-19 and increasing risks to the health of clients and agency staff, verbal consent may be obtained to share client data within the HMIS. This process is designed to ensure clients are informed of their privacy rights and have access to the HMIS Privacy Policy. The updated procedures are effective until the point when concerns for COVID-19 exposure have been mitigated. Once it is safe to obtain a signed consent, the standard ROI procedure should be completed and accurately recorded in the HMIS. The use of verbal consent will only be necessary when there is not a current HMIS Client Consent to Release Information (ROI) in place for the client.
- Work with the DuPage County Health Department and other community stakeholders to identify if any amendments to coordinated entry prioritization are necessary to account for additional vulnerabilities due to COVID-19. The Coordinated Entry System Oversight Committee will be asked to review and recommend any changes prior to submitting to Leadership for approval.
- Work with the Landlord Engagement Task Force and other CoC partners to support landlord engagement efforts, including risk mitigation funds and other initiatives as needed to address expeditiously housing those experiencing homelessness.



- Continue to provide COVID-19 related information, updates, and materials as they become available.
- Assist providers in identifying regulatory barriers by funders and request applicable waivers.