



To: Gatekeepers
From: Homeless Services Section Staff
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Please distribute to: Executive Directors Homeless Services and Rental Assistance Program Staff

Category: Program Informational

Update For: EHA Guidance during COVID-19

Manual: Implementation of Interim Rules

This EHA Program Update has been adopted to relax specific eligibility and assessment requirements to include broader populations that will need assistance due to COVID-19 and to relax program requirements.

Message:

During times of crisis, it is especially important to collaborate across communities and work to ensure that all vulnerable Oregonians are served. Homeless Services expects agencies to engage and collaborate with culturally specific service providers and populations in your area to promote service equity in crisis response. It is the expectation that all agencies delivering services using EHA funds develop methods for determining service prioritization. It is up to each agency and community to determine their prioritization schema to assess severity, acuity and vulnerability.

In response to the crisis posed by COVID-19 the following adaptations are allowable:

- 1) Release of Information (page 7), [813-046-0081]
Clients may provide consent for ROIs via email, text, or give verbal consent over the phone. In such circumstances, the Case Manager is required to sign and date the ROI noting how the client provided consent and the date that consent was given. Once it is safe to do so, the agency needs to obtain a signed ROI for each client who provided consent via this alternative method.
- 2) Service Termination or Denial Letter (page 9), [813-046-0070]
Initial notification may be provided verbally over the phone, via email or other electronic communication, or via text. A written notice and related documentation must still be provided to the client. This can be done through mail, email, or other identified method that ensures the client receives the documentation while also ensuring appropriate distancing and safety measures are met.
- 3) Conflict of Interest (page 11), Requests for a waiver of the Conflict of Interest will receive an expedited review.
- 4) Monitoring (page 12), [OAR 813.046.049, 240]
All monitoring activities are temporarily suspended. HSS Program Monitor will contact your agency once the COVID-19 public health emergency has been lifted.
- 5) Applicant Eligibility (page 13), [813-046-0040]
COVID-19 Emergency Eligibility Determination Method and Requirements:

- a. A household may be evaluated for eligibility under this framework if the household's crisis is directly related to the COVID-19 emergency. E.g. they have lost employment or income as a result of business closures related to COVID-19, have been diagnosed with or been exposed to COVID-19, have been displaced from their housing situation because of exposure to COVID-19 or as a result of public health measures taken to reduce the spread of COVID-19.
- b. Housing Status:
 - i. Households may be determined to be at Imminent Risk if:
 1. The household's primary night time residence will be lost within 21 days of the date of application for homeless assistance.
 2. The individual or family lacks the resources or support networks (e.g., family, friends, faith-based or other social networks) needed to obtain other permanent housing.
 - ii. Households may be determined to be Unstably Housed if:
 1. They meet the criteria of Unstably Housed listed in the Program Manual (page 14).
 2. The household may be determined to demonstrate high risk of losing current housing if they have experienced a loss of income or other threat to housing stability due to the COVID-19 crisis and it is unknown if the problem will resolve in time to avert a loss of housing.

Determining and Documenting Eligibility under COVID-19 Public Health Emergency

- a. Persons impacted by the COVID-19 Public Health Emergency may be assessed for eligibility under the framework that is later described in this update.

6) Housing Status (page 13), [ORS 458.528, 458.650]

(a) Documentation of Housing Status

- (i) The preference of documentation stands as:
 1. Third-party documentation
 2. Intake worker observation
 3. Applicant self-certification
- (ii) Documentation may be received via electronic communication, mail, or other method that maintains safety and upholds distancing and health recommendations.
- (iii) By-passing third party documentation may be done if:
 1. Doing so could not be done without violating a public health recommendation or executive order regarding maintaining safe social distance by staff or client.
 2. Obtaining documentation to determine eligibility and begin services cannot be done in a timely manner such that:
 3. Waiting to obtain documentation would impede the initiation of services such that the client's ability to obtain or maintain housing would be placed in jeopardy.

- a. An emergent housing or health need can be identified for the client and obtaining eligibility documentation is a primary factor delaying the initiation of services to address the emergent need.
4. For clients who can obtain third party documentation but are bypassed under the above criteria should obtain and provide that documentation as they are able to.
- (iv) For clients who are determined eligible under Intake Worker Observation the requirements in the Program Manual must still be followed.
- (v) Clients who are determined eligible under Applicant Self-Certification may self-certify via electronic communication, or verbally over the phone. In such situations, the Case Manager will sign and date the self-certification form noting how and when the client provided the self-certification. When it is safe to do so, the client must sign the self-certification form.

7) Income Documentation (page 14), [OAR 813.046,049]

- iii. EHA provided services require applicants to be low income, i.e., gross household income at or below 80% of area median income.
- iv. For households whose eligibility is determined under this COVID-19 emergency framework gross household income will first be determined using the method detailed in the Program Manual (page 14). Once the amount for the previous 30 days of gross income is calculated the following method may be used to adjust the final gross income amount used to determine eligibility.
 1. $(\text{Previous 30 days gross income}) - (\text{projected income lost over 30 days post COVID-19 related income reduction began}) = \text{Gross household income for determining eligibility.}$
 2. As example:
 - a. The household's income for the 30 days prior to changes in income resulting from COVID-19 is \$2100. The household was earning \$12.50 / hr working 8 hours a day and worked 21 days in the last 30 days. $(12.5 \times 8 = 100 \rightarrow 100 \times 21 = 2100)$.

The household had their hours reduced by half 7 days prior to applying for assistance and is likely to continue working half-time through the rest of the 30 day period. $(12.5 \times 4 = 50 \rightarrow 50 \times 21 = 1050)$. For the purposes of determining eligibility their gross income will be $\$2100 - \$1050 = \$1050$.
 3. Any households who are determined to be income eligible under this provision will need to recertify their income at the point at which the state of emergency is lifted or after receiving a paycheck following an increase in employment earnings.

8) Allowable Program Components and Expenditures (page 16), [ORS 458.650]

OHCS will rely on the knowledge and discretion of CAAs, subrecipients, and service providers to determine the best use of funding for their communities, working with local governments to provide and focus on maintaining health considerations, safety and well-being during the COVID-19 Public Health Emergency.

Street Outreach (page 17)

During the COVID-19 Public Health Emergency, initial assessments can be obtained by phone, text messaging and or email. CAAs will be asked to augment government services in order to provide basic needs for persons experiencing homelessness.

Homeless Prevention and Rapid Re-Housing (page 19)

EHA funding can be used to prevent individuals and households from being at imminent risk of homelessness during the COVID-19 public health emergency.

Data Collection (page 21)

Allow for HMIS releases during the COVID-19 Public Health Emergency to be secured verbally, by email, text, and fax.

9) Definitions (page 32)

- a) During the COVID-19 public health emergency, transportation payments are at the discretion of the agency and case manager to determine the best mode of transportation.

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