Program Guidance During COVID-19

POLICY & PROCEDURE

Applies To: Rapid Re-Housing, Prevention, Problem-Solving, and Shallow Subsidy Programs

Department: Procurement & Performance Management

Approved Date: 3/31/2020

Relevant Documents

- Scope of Required Services for LAHSA-funded Prevention, Problem-Solving, Rapid Re-Housing, and Shallow Subsidy programs
- Form 1083 – Habitability Standards for Permanent Housing
- Form 1388 – Services Extension Request

Purpose

The purpose of this guidance is to provide agencies with allowable programmatic changes during COVID-19 declared by a U.S. government agency. This guidance applies to initial intakes and assessments, Status Updates, annual assessments, case management, habitability inspections, and Financial Assistance and Services Extensions.

Background

LAHSA-funded Prevention, Problem-Solving, Rapid Re-Housing, and Shallow Subsidy programs are required to conduct initial intakes and assessments, Status Updates, and annual assessments on households who receive services. Housing units where the participant who is receiving rental or move-in assistance resides must pass a habitability inspection. This document is intended to provide guidance on conducting these activities during COVID-19.

Guidance

Initial Intakes and Assessments

The purpose of the initial intake and assessment is to gather the essential documents to establish a participant’s eligibility for a LAHSA-funded program. During an initial assessment, program staff seek to gather essential information regarding the participant’s strengths and needs. Program staff use the information collected to formulate an Individual Housing and Service Plan, in partnership with the participant. This Plan identifies the participant’s goals, actions steps, and services they will access to help them reach their goals. The initial intake and assessment are typically administered in-person.

During COVID-19, program staff may not be able to meet with participants in-person and may utilize teleconferencing technology to remotely conduct the initial intake and assessment. Documents may be collected via email, fax, or mail and should be uploaded to the Homeless Management Information System (HMIS) to centralize the collection and storage of documents. This will avoid the need to collect these documents in the future if the participant seeks additional services. Please view LAHSA’s training video for more information.

To aid in the collection and submission of documents electronically, program staff may initially submit documents without participant signatures, however, for financial assistance, subrecipients must validate the identity of
participants receiving financial assistance.

When collecting information electronically, program staff must always protect the participant’s privacy. Program staff should encrypt participant’s email addresses when possible and use the participant’s first initial and last name when referencing. As always, program staff should only email highly sensitive information (e.g. social security numbers, dates of birth, and other identifying information) in encrypted emails. Please contact your Information and Technology Department or software vendor on how to encrypt emails in your system.

When using alternative methods of engaging participants, program staff must ensure the participant’s ability to engage with these types of technologies and compliance with the Americans with Disability Act (ADA).

**Status Updates**
Status Updates occur when the participant experiences a significant life-changing event that impacts their ability to obtain and maintain housing, or at a minimum once per year. During COVID-19, participants may experience significant life events more frequently. Program staff must ensure they provide the appropriate level of care to participants and adjust the Individual and Housing Services Plan accordingly. During COVID-19, a participant may experience loss of employment, reduced employment hours, and/or a reduction or loss in income that may inhibit their ability to obtain or maintain their housing. For Rapid Re-Housing programs, such circumstances may require an adjustment in the participant’s rent contribution. To document the participant’s new circumstances, program staff must complete a Status Update in HMIS. HMIS data standards call for Status Updates to be entered into HMIS within 72 hours of their completion. Please view LAHSA’s training video **What is a Status Update Assessment** for more information.

**Annual Assessments**
As with initial intakes and assessments, program staff may utilize various telecommunication technologies such as mail, email, or faxes to obtain necessary documentation. HMIS data standards require annual assessments to be conducted and entered into HMIS within 30 days before or after the participant’s initial intake date. For example, if the participant entered the program on June 1, 2019, program staff must complete the annual assessment and enter it into HMIS between May 2, 2020 and July 1, 2020. Program staff should run an HMIS Data Quality Report by the 10th of each month to ensure annual assessments are being conducted. Please view LAHSA’s training video **How to Generate HMIS Data Quality Report** for more information.

Program staff should maintain ongoing engagement with participants via email, phone, fax, mail, video conferencing, or in-person meetings to identify if the participant has experienced a significant life event that warrants an update to the participant’s Individual Housing and Service Plan. These mediums may also be used to complete annual assessments and gather necessary documents. Program staff must document their efforts to engage clients in HMIS under Services and Case Notes. LAHSA understands that during COVID-19, intakes, assessments, Status Updates, and annual assessments may take longer to complete and enter into HMIS.

**Financial Assistance and Services Extensions**
Financial Assistance and Services Extensions are requests from service providers to expand the financial and supportive services for participants based on their individual needs and circumstance. These extensions apply to a variety of LAHSA-funded programs based on the scope of required services of the contract; request forms may vary across programs.

During COVID-19, program staff and/or LAHSA staff may be working remotely. To facilitate the processing of Financial Assistance and Services Extensions and remove any potential barriers during COVID-19, LAHSA will allow automatic 90-day extensions without submitting reassessment documents to LAHSA for approval as long as the
participant does not go beyond the funder’s time limits. This would assist in removing any barriers in retaining shelter or housing.

**Habitability Inspections**

All LAHSA-funded financial assistance programs that prevent loss of or place a participant in permanent housing unit require a habitability inspection at prior to disbursement of financial assistance. Habitability inspections must be done in-person utilizing [Form 1083 - Habitability Standards for Permanent Housing](https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards.pdf) and the guidelines found in the code of federal regulations. During COVID-19, in-person inspections may not be feasible due to safety concerns. If program staff are unable to conduct in-person inspections, program staff must utilize one of the following three methods to document a housing unit’s habitability. Program staff must document which method was used and the determination of why the method was used in Service and Case Notes on HMIS.

**Method 1:**

If a participant is enrolled in a program that has completed a habitability inspection within the last year, program staff may use this inspection to document that the unit is habitable. However, if the current funding source of the financial assistance has stricter habitability standards (e.g. ESG Rapid Re-Housing), program staff must conduct a new habitability review of the financial assistance, if feasible. The document may be a copy of what was previously uploaded into HMIS. Program staff must ensure that the unit identified as habitable matches the location where the participant resides.

**Method 2:**

If a habitability inspection was not conducted during the previous twelve (12) months by another program or the participant is moving into a new unit, program staff may utilize pictures or video provided by the participant or landlord as evidence of the unit’s habitability. The evidence must document the separate components evaluated in the habitability inspection form. Picture evidence should be uploaded to HMIS. Video evidence should be stored on the service provider’s computer network. Program staff should indicate they obtained pictures and/or videos in lieu of an in-person inspection in Service and Case Notes on HMIS. If the pictures and/or videos are stored on the service provider’s network, the file’s hyperlink should be included in Service and Case Notes on HMIS and available for review upon request. If hard copies of photo and/or video files are utilized, the case note should be printed and stored in the participant’s file.

**Method 3:**

Based on HUD guidance for ESG programs, using other forms of inspections other than a staff member utilizing the ESG particular Shelter and Housing Standards is insufficient. Below is the link that will provide further information on acceptable habitability inspection:


To facilitate the process of documenting the habitability of a unit, program staff may utilize information from the Los Angeles County Department of Public Health (DPH)’s District Surveillance and Enforcement (DSE) program’s Environmental Health Inspection Results website to document a unit’s habitability. LA County DPH’s DSE program conducts routine and compliant-driven inspections of approximately 60,000 multi-family dwelling properties with 5+ units and compliant-driven inspections of multi-family dwelling properties with 4 units or less to ensure that residential housing within Los Angeles County are safe, sanitary, and fit for human habitation. The DSE program:

• Inspects apartments for health code violations such as vermin (i.e. cockroaches, rodents), and lack of maintenance (i.e. electrical, plumbing, structural).
• Investigates citizens’ complaints regarding general sanitation and nuisance problems.
• Makes referrals to other agencies such as Building and Safety, Vector Control District, Fire Department, and Zoning.

Program staff should follow the following procedures to document the habitability of a unit using the DSE website:

❑ Step 1: Visit DSE’s Environmental Health Inspection Results website.
❑ Step 2: Environmental Health Inspection Results webpage lists inspection results over the past 2.5 years for all currently active food facilities, housing, swimming pools, and food trucks. Users may search for a facility by name, address, city, or zip/postal code. Enter the address or zip code and click search.
❑ Step 3: Identify the desired property and select the inspections hyperlink, the user will get a list of inspection results for the desired property.
❑ Step 4: Select the violations hyperlink, the user will see the inspection date a description of the violation.
❑ Step 5: If there are no violations identified or the violations do not pertain to the specific unit that program staff is trying to conduct a habitability inspection for, within the past 12 months from anticipated move-in, the program staff may print the violation inspection screen with violation description and use it as documentation of habitability. The printout must be placed in the participant’s file.

If program staff are unable to find the property on the DSE website or the website lists a violation with the unit in question, program staff may proceed with alternative method 2 or conduct an in-person habitability inspection of the unit using Form 1083 - Habitability Standards for Permanent Housing once it is safe to do so. Form 1083 must be placed in the participant’s file.

**Monitoring and Compliance**

To better support our agencies during COVID-19, Monitoring and Compliance reviews will be temporarily halted. LAHSA staff will be assigned to service providers to provide guidance related to eligibility and allowability of activities in LAHSA-funded programs.

**Questions?**
If program staff have any questions about this guidance, please contact the appropriate program coordinator or covid19@lahsa.org.