

**CT BOS – Response to Provider Questions & Concerns on COVID-19**

*March 27, 2020*

*Please submit questions to* [*ctboscoc@gmail.com*](mailto:ctboscoc@gmail.com)*.*

*The CT BOS team will answer questions as quickly as possible.*

*Items updated since March 23rd are in red text.*

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To access the Frequently Asked Questions provided by the State of Connecticut, go to: <https://portal.ct.gov/-/media/Coronavirus/COVID-19-FAQs.pdf>

# **Can homeless service programs continue to operate under Governor Lamont’s “**[**Stay Safe, Stay Home**](https://portal.ct.gov/Office-of-the-Governor/News/Press-Releases/2020/03-2020/Governor-Lamont-Signs-Executive-Order-Asking-Connecticut-Businesses-and-Residents-Stay-Safe)**” executive order?**

Yes. Providers of basic necessities to economically disadvantaged populations, including food banks, homeless shelters and other critical human services agencies providing direct care or support are defined under the order as “essential businesses.” The order directs all businesses and nonprofit entities in the State of Connecticut to utilize, to the maximum extent possible, any telecommuting or work from home procedures that they can safely employ.

# **Must we continue to meet all CoC requirements, even when doing so would require face-to-face interactions or divert attention from life-saving COVID-19 containment and mitigation efforts?**

On a recent national call, Norm Suchar (Director, HUD SNAPS Office) repeatedly emphasized that **all projects should make COVID-19 response their top priority**. HUD is actively working to find opportunities to ease regulatory burdens and will strongly consider the crisis in future monitoring. HUD is working on regulatory waivers to provide flexibility for projects to better enable focus on COVID-19.  HUD is working, for example, on a waiver for HQS requirements during the crisis and indicated that they understand that HQS may not always be feasible and that projects can continue to provide assistance if HQS is delayed.  They suggested, for example, using remote strategies for HQS, like Facetime, when feasible. Norm recommended, if your project needs to deviate from usual practices in order to ensure focus on critical COVID-19 related activities, that you make a brief note explaining the rational in your project files, so that it is documented for the purposes of future monitoring. In some, cases, a CoC grant agreement amendment may be helpful. See #2 for information on obtaining an amendment. For guidance on contract amendments specific to your project, please contact the CTBOS team at ctboscoc@gmail.com.

HUD CoC regulations **do not require face-to-face case management**. Guidance on how to reduce risks when face-to-face interaction is unavoidable is available from a number of sources including:

<https://www.csh.org/2020/03/csh-covid-19-supportive-housing-community-platform/>

<https://www.usich.gov/tools-for-action/coronavirus-covid-19-resources>

# **Is there funding available to cover the expenses provider agencies incur related to COVID-19?**

**HUD CoC and ESG Funds**

Information on ESG and CoC eligible costs related to COVID-19 is available at:

* [**Using CoC Program Funds for Infectious Disease Preparedness and Response**](https://files.hudexchange.info/resources/documents/Using-CoC-Program-Funds-for-Infectious-Disease-Preparedness-and-Response.pdf)
* [**Eligible ESG Costs for Infectious Disease Preparedness**](https://files.hudexchange.info/resources/documents/Eligible-ESG-Program-Costs-for-Infectious-Disease-Preparedness.pdf)

A HUD FAQ on using CoC funds on the project administration budget line item for COVID-19 related staff training is here:

* [FAQ: Can CoC project administrative funds be used to train recipient staff to safely deliver assistance during the COVID-19 pandemic?](https://hudexchange.us5.list-manage.com/track/click?u=87d7c8afc03ba69ee70d865b9&id=08fbe68193&e=330d06219a)

A HUD FAQ on using ESG funds for **COVID-19 related staff training** is here:

* [FAQ: Can ESG funds be used to train staff on how to deliver services during the COVID-19 pandemic, including how to recognize symptoms, how to protect recipient staff from infection, and how to protect against spreading the virus while providing assistance?](https://hudexchange.us5.list-manage.com/track/click?u=87d7c8afc03ba69ee70d865b9&id=71c3e55ae2&e=330d06219a)

The HUD CT Field Office has advised that HUD regulations (2CFR200.430) allow grantees to pay more than normal staff pay rates (e.g. **overtime, hazard pay**) in certain circumstances as long as the grantees policies and procedures allow for it. If grantees do not have this provision within their policies and procedures at the current time, they can develop them. Agencies wishing to exercise this option should forward your relevant policies and procedures to the Harford CPD Office. They will review them and, if all is in order, approve them as special disaster policies and procedures.

If your CoC grant needs an amendment to incorporate COVI-19 related costs,

please contact the CT HUD CPD field office immediately for assistance:

<https://www.hud.gov/states/connecticut/working/cpd/contacts>

A shift of more than 10 percent from one approved eligible activity to another eligible activity is considered a significant change and requires a grant agreement amendment from HUD. A shift of less than 10 percent of CoC Program funds from one approved activity to another over the term of the grant does not require HUD approval. However, you must notify the field office of these changes in order to update the budget in LOCCS. Recipients and subrecipients must fully document minor changes to an approved grant or project in their records. If you are a subrecipient of CoC funds, please coordinate with the grant recipient prior to making any changes.

**DMHAS Funds**

For DMHAS projects, agency directors have been contacted by DMHAS regarding agency

supply needs and/or requested programmatic changes during the COVID-19

emergency. Please reach out to your agency leadership regarding any supplies you may

need or any programmatic changes that you’d like to request.

DMHAS is issuing frequent Provider Updates available at <https://portal.ct.gov/DMHAS/Newsworthy/News-Items/DMHAS-Response-to-COVID-19#provider>

Agencies that may be interested in exploring how **EHAF funds** might be used differently in light of the crisis should contact Alice Minervino at DMHAS ( [alice.minervino@ct.gov](mailto:alice.minervino@ct.gov); 860.418.6942.

**Federal Stimulus Funds**

Homeless Assistance is included in Senate/Whitehouse Deal.

Available details are as follows:

* Legislation was pending passage/signature as of 3/26 at 10am.
* $4 Billion for **Emergency Solutions Grant (ESG)** for coronavirus prevention, preparation and response:
  + Can be used to cover costs incurred prior to enactment of the Act
  + All match and planning requirements waived
  + Allowable uses include hotel/motels for people at risk of infection, symptomatic, and/or COVID 19+
  + Waives cap on amount used for shelter, habitability, and environmental review requirements
  + Provides HUD with broad waiver authority
  + HUD is required to sustain a focus on Housing First practices for activities supported with these funds

* **Coronavirus Relief Fund:**
  + **$**150 billion for a Coronavirus Relief Fund with only a general description provided in the Act so far.
  + Payments to be made to States, Tribal governments, and unit of local government to cover costs that:
  + Are necessary expenditures incurred due to COVID-19 public health emergency;
  + Were not accounted for in the budget most recently approved as of the date of the Act for the State of government;
  + And were/are incurred between March 1, 2020 and December 30, 2020.
* On a 3/27/20 webinar, HUD emphasized the **significant scope** of this additional funding. As a point of comparison, the 2009 HPRP fund allocation was 1.5B nationally. HUD encouraged immediate planning by projects and system leaders to significantly **ramp up capacity in RRH projects to expend new funds**.

**FEMA Funds**

Information about expenses eligible for FEMA assistance is below:

* [FEMA Public Assistance - Coronavirus (COVID-19) Pandemic: Eligible Emergency Protective Measures](https://hudexchange.us5.list-manage.com/track/click?u=87d7c8afc03ba69ee70d865b9&id=7c4f23f81c&e=330d06219a)

CTBOS will circulate other potential funding resources as they become available.

# **How can we obtain supplies needed to reduce COVID-19 risks?**

In some cases, purchasing such supplies is an eligible CoC or ESG expense -see #3.

CT DOH has requested that all supply requests from programs they fund be centralized through your CAN lead. CAN leads are responsible for collecting and referring requests to DOH. On a recent national call, HUD SNAPS staff indicated that the recommended path to secure necessary protective, hygiene, cleaning and other supplies is through your local county and, as necessary, state departments of health and that those agencies are coordinating requests to the federal government. CCEH has posted a map of local health departments and districts at <https://cceh.org/2020/03/20/11330/> in CT. USICH has posted a directory of health departments that includes contact information at <https://www.naccho.org/membership/lhd-directory>

# **What changes have been made to help prevent evictions, foreclosures, and rent/mortgage late fees?**

For current information on the status of efforts to prevent homelessness through moratoriums on evictions, foreclosures and late fees, visit [www.ctfairhousing.org](http://www.ctfairhousing.org). Information about fair housing protections for people infected with or perceived as being infected with COVID-19 is also available at that link.

Information on this topic is also available in the Frequently Asked Questions provided by the State of Connecticut: <https://portal.ct.gov/-/media/Coronavirus/COVID-19-FAQs.pdf>

# **How can we help clients to obtain and maintain benefits if offices are closed?**

Though CT DSS has suspended in-person visits to field offices as a protective measure for customers and staff, they are continuing to provide services. Customers can access benefit and application information 24/7 at [www.connect.ct.gov](http://www.connect.ct.gov) and [www.ct.gov/dss/apply](http://www.ct.gov/dss/apply); or 1-855-6-CONNECT; Information on ways to contact DSS online, by phone, by mail and at office dropboxes is at [www.ct.gov/dss/fieldoffices](http://www.ct.gov/dss/fieldoffices)

To access information on current benefits, go online through your [**My Account**](https://connect.ct.gov/access/auth/accessController?id=0.1617570708695396&languageCode=en) or call the DSS Benefits Center at 1-855-626-6632.

The Social Security Administration has also suspended in-person services. SSA is providing limited, critical services via phone, mail, and online. For information about what types of services the SSA is currently providing on-line and by phone and how to access those services go to: <https://www.ssa.gov/coronavirus/>

# **How will CANs continue to operate during the crisis?**

CT DOH has issued a Memorandum entitled “Changes to CAN appointments for COVID-19 to support ongoing effectiveness of CAN operations. That memo is available at: <https://cceh.org/2020/03/20/11330/>. As always, if you have any immediate concerns, regarding CAN operations, please contact either Kara Capobianco (kara.capobianco@ct.gov) or Leigh Shields-Church (leigh.shields-church@ct.gov).

# **Since libraries and other places where homeless people often go during the day are closed, what alternative resources exist.**

CTDOH has asked shelters to remain open 24/7 in order to alleviate the need for day centers & prevent people from being on the street during the day.   Though many are doing this, the practice is varies from region to region.

# **How can we access phones/minutes for participants to enable us to keep in touch remotely?**

**Assurance Wireless** (Virgin Mobiles version of Safelink) is giving all of their customers unlimited minutes and texts from now through 5/20 as well as 6 GB of data for free.

**TracFone/Straighttalk** (Walmart's minute plan): Partnering with Safelink Wireless to enroll clients in free minutes, assistance with bill pay, waiving reactivation fees, setting clients up with data and texting packages. Can visit [safelinkwireless.com/enrollment](http://safelinkwireless.com/enrollment) of contact 1800 723 3546 for details.

**Verizon:** suspending late fees/re-connection fees, bill assistance, and getting extra minutes with proof of poverty, unemployment due to COVID. Best way is to assist clients, as needed, to apply online through the account.

**AT&T:** free/reduced cost wifi/hotspots through your phone, unlimited data for all existing clients, and providing services at $10 per month for families with no income, low income, or financial strain due to COVID. Will extend the $10 per month plan after COVID crisis. Online is the most efficient way to apply due to the high number of callers (per info on website).

**Cricket:** dial 611 to enroll in any COVID relief programs. Waiving re-connection fees, and all service fees on payments. Can use Bridge Pay to pay current bills in future months, over a longer period of time, and/or smaller payments per billing cycle. Includes minute plans. To call 611 you must call off of the Cricket issued phone, if someone else is calling for the client the number is 1 800 274 2538.

# **How can our program access Narcan?**

Please contact Brenda Earle at DMHAS renda.earle@ct.gov for any Narcan needs.