

January 12, 2021

Board of County Commissioners  
Clackamas County

Members of the Board:

**Approved Housing & Urban Development Continuum of Care exception request for the 2021 Point-in-Time Count**

<b>Purpose/Outcomes</b>	To inform the BCC that a request has been granted from HUD for the Clackamas County Continuum of Care to use an alternative data collection strategy for our unsheltered Point-in-Time (PIT) count for 2021.
<b>Dollar Amount and Fiscal Impact</b>	No fiscal impact.
<b>Funding Source</b>	U.S. Department of Housing & Urban Development Continuum of Care grants
<b>Duration</b>	The approval only applies to the 2021 unsheltered PIT count.
<b>Previous Board Action</b>	The BCC approved the CoC HMIS grant on August 3, 2020 & CoC planning grant on October 15, 2020
<b>Strategic Plan Alignment</b>	1. Ensure safe, healthy and secure communities 2. Individuals and families are healthy and safe
<b>County Counsel</b>	HUD initiated, County Counsel not contacted
<b>Contact Person</b>	Brenda Durbin / Social Services Director / 503-706-6746
<b>Contract No.</b>	H3S 9828 and 9860

**BACKGROUND:**

HUD initiated correspondence with all Continuum of Care on November 2020 with information on conducting the HUD mandated 2021 unsheltered PIT count. H3S staff and the Continuum of Care Steering Committee have reviewed HUD's correspondence, completed due diligence and communicated with HUD to see if we qualified for an exception. We received approval for an alternative method to collect data from HUD on December 7, 2020. This will allow us to be in compliance with HUD regulations. Please reference attached document for further background information.

**RECOMMENDATION:**

We inform the BCC of the Dec. 7<sup>th</sup>, 2020 HUD approval for the 2021 CoC PIT count.

Respectfully submitted,

Richard Swift, H3S Director

Attachments: memo on Approved 2021 Unsheltered PIT County Exception

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## **Approved 2021 Unsheltered PIT Count Exception**

### **1. What is the Point-in-Time Count and its purpose?**

Pre COVID-19, the Point-in-Time (PIT) count was a physical count of sheltered and unsheltered people experiencing homelessness on a single night in January. The Department of Housing and Urban Development (HUD) requires that Continuums of Care (CoC) conduct a count of people experiencing homelessness who are unsheltered or sheltered in emergency shelter and transitional housing on a single night. Each count is planned, coordinated, and carried out locally. The effort involves mobilizing staff and volunteers who canvass the streets and other settings to identify and count people experiencing homelessness.

In January 2019, Clackamas County conducted an unsheltered PIT count that included over 150 volunteers counting throughout the 7-day window at 62 different sites including food pantries, faith-based orgs, agency waiting rooms, schools, and outdoor areas.

Accurate data collection is critical to effective planning and performance management toward the goal of ending homelessness for each community and for the nation as a whole. Counting those who are unsheltered ensures that many of the people with the highest needs are taken into account in community planning. Clackamas County Continuum of Care agencies received \$2.7 million from HUD in 2019 for programming that serves families and individuals experiencing homelessness. This includes two grants totaling \$149,801 for Clackamas County Community Development to administer, plan, oversee and manage HMIS, and prepare the application for the annual renewal of HUD CoC funds.

### **2. Why the CoC cannot conduct a full unsheltered PIT count in 2021.**

Like elsewhere across the US, rates of COVID infection, hospitalization and death has been increasing at alarming rates across Oregon and Clackamas County. As of Dec. 28, 2020, Clackamas County is currently designated at the highest level - extreme risk. This is resulting in many facilities being restricted or closed. Some closed facilities are traditional PIT count sites.

A majority of PIT count volunteers are older adults and/or currently experiencing homelessness. Justified fears of contracting COVID have drastically decreased our potential volunteer pool. We believe the minimal benefits of a traditional PIT count cannot outweigh the real threat to the health of both those doing the counting and those being counted.

In November 2020, HUD communicated with Continuum of Care's guidance for conducting the 2021 **unsheltered** PIT count:

“To maximize safety but allow for sufficient data collection to understand basic trends among people experiencing unsheltered homelessness, HUD is providing the following flexibilities for the 2021 unsheltered PIT.

Safety Basics:

During the PIT count, adhere to the following COVID-19 safety basics.

- Decrease face-to-face interaction with clients
- Decrease the number of volunteers who need to work in physical proximity
- Provide personal protective equipment for volunteers
- Design volunteer processes that minimize close contact

## Approved 2021 Unsheltered PIT Count Exception

### Data Collection Considerations

Exception Allowance: HUD will allow CoCs to request an exception to some or all of the unsheltered PIT count requirements.”

H3S staff and the Continuum of Care Steering Committee reviewed HUD’s correspondence and moved forward with requesting an exception on December 7, 2020. This exception was granted from HUD within 46 minutes:

“Thank you for submitting your request for OR-507 – Clackamas County Continuum of Care (CoC) to be excepted from conducting all of the 2021 unsheltered Point-in-Time (PIT) count. My understanding is that you are requesting the ability to use an alternate dataset (i.e., HMIS) to conduct your 2021 unsheltered PIT count. You are not currently seeking an exception from any other requirements (though you have the ability to do so in the future if necessary).

Your HMIS analysis shows strong correlation between the data in your system and those identified as unsheltered in 2019.

Given the circumstances you described in your CoC, including the heightened safety risk due to COVID surges, lack of staff capacity, and lack of volunteers, HUD approves you to use this alternative data collection strategy for your unsheltered PIT count. This approval only applies to the 2021 unsheltered PIT count.

Clackamas County has sufficient data, through Coordinated Entry, to submit full unsheltered PIT information without conducting a risky street count” (email from William Snow, Dec. 7, 2020 10:51am).

### 3. Benefits of change -

Using the alternative dataset (HMIS), we will submit full data for the 2021 unsheltered PIT count. Clackamas County will remain in compliance with HUD regulations. This is a result of a high performing Continuum of Care and efforts of H3S staff.