

To: Continuum of Care Committee
From: Point In Time Count Advisory Committee
Date: December 16, 2020
Re: Requesting a Waiver of 2021 Unsheltered Point In Time Count Requirements

Recommendation from the Point In Time Count Advisory Committee

Continuums of Care (CoC) received HUD Guidance on Conducting the 2021 Unsheltered Point In Time Count¹ on November 13th 2020. At that time, Alameda County was in the Orange “moderate” risk level, and as a community it was anticipated that we could make COVID safety adjustments in order to conduct an observational count of unsheltered persons in late February. On November 16th Alameda County’s risk level escalated to the Purple “widespread” level, and on Monday December 7th Alameda County returned to strict Shelter-in-Place guidelines. The rapid intensification of the COVID-19 pandemic in Alameda County presents challenges that render the unsheltered component of the 2021 PIT Count infeasible at this time. The challenges fall into three groups: Count Inaccuracy, COVID-19 Risks, and Public Health Orders. After review and consideration of the health and safety of all involved, the Point In Time Count Advisory Committee voted unanimously to recommend that the CoC Committee request a full waiver of unsheltered Point In Time Count Requirements.

Below please find more detailed explanation and support for the recommendation as well as recommendations for collecting an unsheltered enumeration in January 2022 and the possibility for other unsheltered population data in 2021.

Count Inaccuracy

- ***Homeless Guides are a key component of the PIT methodology.*** The CoC relies upon not fewer than 200 paid Homeless Guides to lead teams with other volunteers in counting areas that are familiar to the guides. Our PIT methodology depends upon Homeless Guides as key informants with knowledge of where to find homeless people. However, Guides are a vulnerable population that so far has a lower rate of COVID-19 infection than the general population. Homeless persons are most likely to become infected through interactions with the housed population. For this reason, using homeless guides to lead counting teams exposes them to unnecessary risk. Applied Survey Research (ASR) our research partner in producing PIT Count data has seen that without Guides’ expertise, communities grossly undercount the numbers of people experiencing unsheltered homelessness. Without hiring a sufficient number of Guides and the community partners to assist with recruitment and logistical support ranging from communication to technology for virtual training, an insufficient number of guides will result in significant undercounts in the areas not assigned a guide where unsheltered people are less visible to people passing by.
- ***Insufficient Counters will compromise the accuracy of the unsheltered PIT Count.*** Should restrictions ease, the Alameda County PIT Count requires 500 Counters. Usually Counters are recruited from city and county government, nonprofit service providers, community based organizations, police and sheriff, and concerned community members. Current shelter in place orders preclude organizing and mobilizing a large group of volunteers to execute a count. As well, a survey of street outreach and other frontline service providers shows that they do not have capacity to conduct an unsheltered PIT Count. Providers described themselves as “stretched,” “operating at effort level 10,” and “taking on too much.” Additionally, providers were reluctant to divert staff time from delivering essential services to conducting a non-essential PIT Count. In the event restrictions ease and/or we could recruit a household to serve in areas not needing a Guide, HUD, Applied Survey Research and sister communities report significant chilling of volunteer recruitment. This is not surprising as public health experts call upon the public to cancel holiday gatherings. However, insufficient Counters poses a significant barrier to effectively and accurately counting people experiencing unsheltered homelessness in every census tract.

¹ <https://files.hudexchange.info/resources/documents/Conducting-the-2021-Unsheltered-PIT-Count.pdf>

- **Applied Survey Research (ASR) expects an unsheltered count would produce a significant undercount.** Without the use of homeless guides or volunteers, ASR believes Alameda County will register a significant undercount.
- **The 2021 PIT will not be comparable to previous PIT Counts.** For all the above reasons the 2021 PIT count will not be comparable with previous counts. HUD has made clear that unsheltered PIT data is meant to provide a “general sense” of whether unsheltered homelessness has increased or decreased while at the same time indicating that the data must also be reliable.
- **HUD expects a reliable count from communities that do an unsheltered Point in Time Count.** If the community decides to do an unsheltered PIT count, William Snow of the SNAPs Office has stated on multiple occasions that the community must be confident that the findings are an accurate representation of unsheltered homelessness.

COVID-19 Risk

- **Alameda County Health Officer and Health Care Services Medical Director do not recommend proceeding with a Point In Time visual count or survey.** On Tuesday December 15th Alameda County Health Care provided the following statement:
 - *After review and consideration of the health and safety of all involved, the Alameda County Health Officer, Dr. Moss and the Health Care Services Medical Director, Dr. Clanon do not recommend proceeding with a Point In Time visual count or survey as long as the County remains in the State of California’s Coronavirus Purple or Red Tier based on transmission and hospitalization rates.*
- **Homeless Guides are part of a highly vulnerable population.** The health impacts of homelessness are well known and documented, making homeless people at especially high risk to medical complications from COVID. California state guidelines issued in March, 2020 state:

Because of the higher likelihood of pre-existing health conditions and the transient nature of the homeless population, people who are homeless or at risk of homelessness, and the people who interact with this population, may have an increased risk of COVID-19 infection and greater potential to increase COVID-19 transmission.²
- **Bringing more people into contact with unsheltered people adds unnecessary risk.** Despite increased risk to medical complications from COVID-19, the unsheltered population has been infected at a lower rate. A December 5th opinion piece by Dr. Harrison Alter in the *San Francisco Chronicle* points out that, “most of the few small outbreaks we’ve seen have been introduced into communities of homeless people by way of the housed community.”³ For this reason, even holiday donations to encampments are being discouraged as a way of protecting unsheltered people from infection. Anecdotal information suggests that while the COVID outbreaks in people experiencing homelessness was low initially, that trend may be shifting as some shelters in Alameda County are now dealing with COVID transmission within their facilities.
- **Intersection of racial and health disparities in the homeless population.** Moreover, homeless persons generally and Guides specifically are disproportionately Black and people of color. The intersection of racial and health disparities in the homeless population raises ethical concerns about paying homeless Guides to engage in social interactions such as leading a count or administering surveys, which increase the likelihood of COVID-19 infection and mortality. Under current conditions this arrangement exploits Guides’ economic circumstances and puts Black and Brown persons in high-risk for contracting, spreading, and/or experiencing medical complications from the coronavirus. Furthermore, the rates of death from COVID among Black people more than double the death rate for whites⁴, amplifying even more the health risk and exploitive nature of hiring Guides and interacting with people who are unsheltered.

Public Health Orders

² Memo to Homeless Assistance Providers from the California Business, Consumer Services, and Housing Agency. (March 10, 2020). https://www.bcsd.ca.gov/hcfc/documents/covid19_guidelines.pdf

³ Alter, Harrison. (December 5, 2020) “Helping the homeless: Channel your compassion in a safe way.” *San Francisco Chronicle*. <https://www.sfchronicle.com/opinion/openforum/article/Helping-the-homeless-Channel-your-compassion-in-15777243.php>

⁴ Alameda County Health Care Services Agency Public Health Department. COVID-19 Data. <https://covid-19.acgov.org/data>

- **Homeless Services that provide support to ensure the health and well-being of vulnerable populations are “essential infrastructure.”** California state guidelines recognize many aspects of homeless services as essential infrastructure. These include helping homeless and economically disadvantaged households to access “necessities for life” such as food, shelter, in-home supportive services as well as healthcare, housing solutions, and taking measures to protect homeless populations.⁵ The unsheltered Point In Time (PIT) count is not considered an essential services in promoting health, well-being and safety of homeless populations as described here. The PIT Count will expose frontline staff members to additional and unnecessary risk of COVID-19 infection for non-essential PIT Count Work. As one stated, “put sheltered and unhoused residents first now and count later.”
- **The Unsheltered Point In Time (PIT) Count is not essential work according to the US Department of Housing and Urban Development, and a failure to complete the PIT Count will not have negative impact on future funding.** HUD has acknowledged that health risks may be too great to conduct the unsheltered PIT at this time. HUD has assured communities that the unsheltered component of the PIT Count may be waived by request without impact to future funding or standing. Many CoCs have requested and received a waiver from HUD, including Los Angeles, California. Los Angeles moved into the Purple “widespread” risk level on November 20th and effected a stay-at-home order on December 2nd. The Los Angeles Homeless Services Authority received approval from its commission to request a waiver of unsheltered PIT requirements on Friday December 4th and announced approval from HUD on Monday December 7th. Eleven other communities in the LA region are expected to follow suit.
- **The current public health orders contradict the required methodological needs to conduct an unsheltered count.** The current Shelter-in-Place Order (20-21)⁶ is prohibitive of a Point In Time Count, which requires non-essential travel and social interaction with some of Alameda County’s most vulnerable residents—people experiencing homelessness. At this juncture, shelter in place restrictions are in effect in Alameda County until January 4, 2020. The order asserts:
 - *“...all gatherings with members of other households or living units are prohibited within the County of Alameda unless expressly permitted.”*
 - *All non-essential travel within or without the County of Alameda is prohibited until further notice. The Health Officer will continue to monitor several key indicators (“COVID-19 Indicators”) to inform their decision as to whether to modify the restrictions. Scientific evidence shows that at this stage of the emergency, it remains essential to continue to slow virus transmission to help (a) protect the most vulnerable; (b) prevent the health care system from being overwhelmed; (c) prevent long-term chronic health conditions, such as cardiovascular, kidney, and respiratory damage and loss of limbs from blood clotting; and (d) prevent deaths.”*
- Purple tier risk containment strategies include a curfew on non-essential activities between 10:00PM and 5:00AM
 - During Unsheltered Point In Time Count Office Hours on December 3rd, William Snow at HUD affirmed that the PIT Count must take place during overnight hours. The unsheltered PIT cannot take place during daytime hours.
- Purple tier risk containment strategies limit social interaction, particularly indoors.
 - The PIT Count requires significant social interaction between people of different households including riding in cars to cover Alameda County’s 739 square miles of diverse geography (urban, suburban, and rural areas).
- **Alameda County’s COVID-19 Case rate continues to intensify.** Between 12/2/ and 12/9 the case rate in Alameda County increased by 93%. This may be the lagging impact of Thanksgiving socializing. Public health experts at the national, state, county, and city levels are encouraging residents to cancel Christmas and New Year’s social plans. An opinion from the Public Health Department is forthcoming. Additionally, Health Care for the Homeless reports more cases of COVID-19 in the unsheltered homeless population in the first two weeks of December

⁵ Official California State Government Website. “Essential Workforce,” last updated 12/10/2020. <https://covid19.ca.gov/essential-workforce/>

⁶ <https://covid-19.acgov.org/covid19-assets/docs/shelter-in-place/20-21-social-distancing-eng.pdf>

than in any other month except August 2020. Roots Community Health Center reports positive rates that positivity rates are soaring, particularly in East Oakland. Frontline staff are being infected at higher rates, too. A service provider reported more COVID-19 infections among frontline workers during the first 2 weeks of December than in all previous months.

- ***Vaccination will not be readily available even to high-risk groups at the end of February 2021.*** The end of February is the latest possible date that the CoC could conduct the unsheltered count. According to Kerry Abbott, Health Care Service Agency staff do not expect that vaccination will be available in amounts necessary to protect homeless Guides or volunteers.

Recommendations

For the above reasons, the Research and Project Management Team (comprised of the research firm Applied Survey Research (ASR), Alameda County staff, Aspire Consulting LLC and EveryOne Home staff) and the Advisory Working Group (comprised of City and County governments, persons with lived experience, and community-based organizations) recommend that the CoC request a waiver of the unsheltered PIT count requirements for 2021.

The committee further recommends that the CoC consider conducting the survey component of the PIT Count if and when risk levels allow, and that the CoC conduct a full count and survey in January 2022. The CoC will be required to conduct another full count and survey in January 2023.

Participation in 2021 Point In Time Count Advisory Committee

The CoC Committee agreed to the PIT Count Advisory Committee structure at the meeting on September 15, 2020. Participants, their organizational affiliation, and final votes are as follows:

2021 Point In Time Count Advisory Committee		
Participant	Organization	Vote
Ana Bagtas	City of Alameda	not present
Josh Jacobs	City of Berkeley	Yes
Tyler Phillips	City of Dublin	Yes
Emi Theriault	City of Emeryville	not present
Laurie Flores	City of Fremont	Yes
Amy Cole Bloom	City of Hayward	Yes
Josh Thurman	City of Livermore	Yes
Talia Ruben	City of Oakland	Yes
Becky Hopkins	City of Pleasanton	Yes
Elsa Castillo	City of San Leandro	Yes
Sharon Petrehn, Pedro Naranjo, Sushil Swamy	City of Union City	Yes
C'Mone Falls	Continuum of Care Committee	abstained
Kerry Abbott, Suzanne Warner, Sasha Savinovich	Alameda County HCSA	Yes
Riley Wilkerson	Alameda County HCD	Yes
Masaki Hirayama	VA Medical Center	Yes
Kate Dettmer, Denah Nunez	Abode	Yes
Bilal Ali	Lived Expertise/BACS Outreach	Yes
Hannah Moore, Jessica Blakemore	All In Youth Advisory Board	Yes