



# The Framework for an Equitable COVID-19 Response

# Top Priorities and Actions Across Communities



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# About

## Why was this document created?

As the COVID-19 pandemic continues to unfold, old patterns are reasserting themselves with historically marginalized communities being left out of planning and response processes. These patterns have resulted in predictable gaps in the pandemic response that have left our most marginalized neighbors at unacceptable risk. There is a clear need for further guidance to local jurisdictions who are planning for the response and recovery of the pandemic, in order to ensure that the priorities of historically marginalized communities are centered in the response.

## How was this document created?

### *The National Working Group on Historically Marginalized Communities*

The National Innovation Service (NIS) Center for Housing Justice team, along with other national leaders, started by creating a national working group on historically marginalized communities. The working group brings together a small group of national and local policy experts and advocates alongside direct service providers and people serving the communities most impacted by the pandemic. It includes representatives from mid-sized cities, rural areas, and denser cities.

### *Listening Sessions*

The working group partnered with the NIS Center for Housing Justice to design a series of listening sessions with historically marginalized communities. The working group members informed which groups to focus on, the questions that should be addressed, the protocols to be used in the listening sessions, and the recruitment of participants from around the country. This work resulted in ten listening sessions with 55 participants in June 2020. The listening sessions represented the following communities: Asian American<sup>1</sup>; Black; Latinx; Native-Indigenous; Pacific Islander, Lesbian, Gay, Bisexual and Queer (LGBQ); Trans<sup>\*2</sup>; People Living with Disabilities; People with Incarceration Histories; and People Involved with Public Systems.

### *Population Specific Briefs*

After conducting the listening sessions, the NIS Center for Housing Justice created population-specific briefs to summarize the ideas of each of the ten communities<sup>3</sup> and offer suggested

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1 Asian Americans is a broad term describing a diaspora of people from many specific counties and cultures in Asia. The conversations did not tease out these differences, so they are not addressed here, but we want to recognize that variance of experience and ideas exist.

2 Trans\* is a term that is used to refer to both transgender identified individuals while also creating space for other gender-expansive identities people have who may not identify as explicitly transgender but are often have similar experiences with gender-binary systems

3 The LGBQ and Trans\* listening sessions are combined into one brief. For information about our considerations in doing so, see details in that brief.

actions that local jurisdictions can take in response to the concerns and priorities raised by people who are being marginalized. The Center for Housing Justice team also analyzed the recommendations collected in all ten listening sessions, and highlighted the themes in a stand-alone document. This themes document represents the most commonly discussed issues across all ten communities and organizes them around four suggested actions that a local jurisdiction could take to create a more equitable response to homelessness, centering the priorities of those communities who are most marginalized.

## How is the document organized?

The document is organized around the Top 4 policy shifts towards equity. These are suggested policy shifts that correspond directly with the concerns and priorities raised by community members across most of the listening sessions. Each action has the following three components:

1. **Topline Message** - This offers a deeper explanation of the action item, including why it is needed in local homelessness response efforts, and how a local jurisdiction could move forward with the action.
2. **Marginalized Population Considerations** - While the priorities can be grouped by action categories, this column highlights the ways in which the actions toward equity had some key differences between each of the marginalized community groups. A more robust reporting of the concerns and priorities of the different marginalized communities can be found in the population-specific briefs.
3. **Framework Actions** - These offer suggestions on the ways in which these actions could be taken alongside the The Framework for an Equitable COVID-19 Homelessness Response as jurisdictions around the country are making decisions about how to address housing instability in the time of COVID-19.

## How should this document be used?

1. This document should be used alongside The Framework for an Equitable COVID-19 Homelessness Response as a planning tool for local jurisdictions working on addressing housing instability and homelessness during the pandemic and the recovery that will follow. Specifically the tool can supplement the Framework in bringing the concerns and priorities of the most historically marginalized communities to the forefront of the planning.
2. This document should be used as a conversation tool with marginalized communities in local jurisdictions. One that can start a local discussion to gather the concerns and priorities of marginalized community members and then work to center them in the planning and implementation of the homelessness and housing response. Example discussion questions may include:
  - a. What resonates with a particular historically marginalized community in the local jurisdiction and what is missing from the brief from their perspective?
  - b. Are their actions in the document that historically marginalized communities would prioritize locally and why?

- c. Based on this document and the local conversations with marginalized communities, is there something your system needs to do differently when panning your homelessness response?
  - d. What ways can marginalized communities partner with the homelessness response system to implement these policy shifts?
3. This document should be used when thinking about the various COVID-19 response relief funds becoming available and the ways in which they can be utilized to transform the homelessness response system for the most marginalized communities in a jurisdiction. Local jurisdictions can compare the way in which CARES Act funds and other state and local relief funds are being used locally to the recommendations in the brief and in local conversation with those most marginalized communities. The document makes general recommendations on the ways in which federal CARES Act funding could be utilized for these purposes; it should be used alongside The Framework and other CARES Act guidance to explore the specific uses of the different relief funds, as each set of funds under the CARES Act has a different set of allowable uses that can support the 4 policy shifts towards equity.

## Top 4 Policy Shifts

1. Implement a crisis response that ends the use of large congregate shelters and creates dignity-based, safe, temporary crisis options as a bridge to long-term housing. 6
2. Build, support, and fund dignity-based services led by the communities most impacted by homelessness. 10
3. Develop affordable housing in the most impacted communities and target housing and rental assistance to those most impacted by structural inequity. 13
4. Divest from policing, remove police from the homelessness response system, and invest a portion of the funds in housing and services to communities most impacted by police brutality. 16

## ADDITIONAL BRIEFS:

### Priorities from:

[Asian Americans](#)

[Black People](#)

[Latinx People](#)

[Lesbian, Gay, Bisexual, Queer \(LGBQ\)/Trans\\* People](#)

[Native-Indigenous People](#)

[Pacific Islanders](#)

[People with Incarceration Histories](#)

[People Involved with Public Systems](#)

[People Living with Disabilities](#)

## Policy Shift 1:

# Implement a crisis response that ends the use of large congregate shelters and creates dignity-based, safe, temporary crisis options as a bridge to long-term housing.

## TOPLINE MESSAGE:

An equitable homeless response system should be centered around the most immediate access possible to long-term housing. Knowing that not all individuals and families will be able to walk into long-term housing immediately upon entering the homelessness response system, there is a need to create dignity-based, safe, temporary crisis options that bridge people to long-term housing.

The work of many cities, counties, and states to move people into non-congregate temporary crisis settings during the COVID-19 pandemic serves as a proof point that it is possible to re-imagine the crisis response to homelessness and offer safe temporary options that do not depend on congregate shelters. Communities need to continue and improve upon these efforts with CARES Act funds in order to fully realize a system with no large congregate shelters and adequate safe, temporary, crisis options for anyone in need of shelter in the community.

Large congregate-style shelters that warehouse individuals, lack private and safe living space, have inadequate services, and often apply rigid rules to gain and retain access, are actively causing harm to marginalized groups. CARES Act funds should be used to help move toward abolishing large congregate shelters and instead create systems that house people rather than warehouse them. Doing so now during the COVID-19 pandemic has added benefits.

This will require long-term planning to shift funding away from large congregate shelters and toward:

- hotel/motel/SRO options for temporary use,
- the re-shaping of transitional housing stock to create more dignity based crisis options.
- targeted prevention and diversions services, including financial support to kinship networks and direct cash transfers to individuals and families, that leads to less dependence on more formal crisis options, and
- more immediate and direct access to long term housing through rental assistance and the development of affordable housing prioritized for marginalized communities.

## MARGINALIZED POPULATIONS CONSIDERATIONS

Members of several marginalized communities (Native-Indigenous, Pacific Islander, People Living with Disabilities, People Involved in Public Systems, and LGBTQ/Trans\*) called for abolishing or completely defunding the shelter system. They called for an investment in permanent housing and a temporary crisis option that offered the safety and dignity not experienced in large congregate shelters.

**Pacific Islander and Native-Indigenous community members** described cultural ties to larger and extended families. They called for crisis options that allow for families, as defined by the community, to stay housed together and not separated by gender, age, or family definitions that do not align with cultural norms of those being served.

**Trans\* community members** reported regular harassment and victimization in shelters, despite the Equal Access Rule. They stressed the need for all crisis options to give equal and safe access to any person based on gender identity as presented by the individual.

**Members from many different marginalized communities** described a dependence on kinship networks to avoid unsafe shelter stays; as communities navigate the economic fallout of the pandemic these networks will become more critical. They called for financial support of these kinship networks at the same levels of traditional families to help communities safely divert from the formal shelter system and/or quickly move out of homelessness.

## FRAMEWORK ACTIONS

### Unsheltered Actions

- Utilize CARES Act to fund targeted outreach efforts that result in emergency and long term housing placements. These efforts should be led by organizations that represent the identities of those served and performed by those closest to the work, ensuring that police are not part of any service model. This will require communities to recruit new recipients, offer ongoing support to administer federal funds, and foster partnerships with existing recipients of federal funds.

### Sheltered Actions

- Any CARES Act funds used for sheltering activities should be required to create non-congregate crisis options. Organizations led by marginalized communities should be prioritized for any new CARES Act funding used to create these options and the new model should be informed by those with lived experience. Communities should also divest from organizations offering shelter that have continuous issues with discriminatory policies and/or a culture of harassment.
- All crisis options should be connected to dignity based services as described below. Policies should ensure that individuals and families can define the make-up of their family, that equal and safe access is given to any person based on the gender identity as presented by the individual, and admittance and dismal policy do not

disproportionately affect any marginalized communities, particularly youth and young adults within marginalized communities.

- As CARES Act funds are utilized to shift the system away from large congregate shelters, prioritization for the non-congregate crisis options should include those that are at highest risk of harassment and victimization within congregate shelter, including youth and young adults, women and Trans\* community members.

## Housing Actions

- Housing is the solution to homelessness. Communities will not be able to move towards abolishing congregate shelters over time without focusing on the rehabilitation, preservation and development of affordable housing in marginalized communities and targeted to individuals and families from marginalized communities.

## Diversion and Prevention Actions

- Prevention and diversions services should include financial support and supportive services to kinship networks, as defined by marginalized communities, to include fictive kin. This should include flexible rental assistance or cash support to kinship networks at the same levels it is available to traditional families and direct cash transfers to individuals that can be used to support housing within kinship networks. Communities should use CARES Act funds to the extent possible within the regulations, in combination with funds divested from the police and other sources to create these flexible supports to kinship networks as a form of crisis assistance, particularly for youth and young adults within marginalized communities.
- Eviction prevention and diversion programs that are offered on a first-come-first served basis often perpetuate inequity in the system. CARES Act prevention funds should be targeted to those most at risk of homelessness, or who have been historically marginalized, not just those at risk of eviction during the current crisis. This risk assessment should assess for the effects of structural inequity such as:
  - high vulnerability to COVID-19 complications
  - social determinants of health
  - community level factors such as zip code that indicate marginalization and disparities in facing COVID-19 or experiences of homelessness
  - involvement in systems with high levels of disproportionality such as child welfare and justice
  - lack of access to basic services such as quality, safe housing within a community, employment opportunities, health care, food, and transportation
- Extend eviction moratoriums and enact rent freezes till the end of the pandemic. The most effective eviction prevention strategies available are to extend legislation or emergency declarations that create eviction moratoriums. Additionally, jurisdictions should actively look into rent freezes as the country continues to slide into an economic downturn. This should be paired with mortgage relief to owners of affordable housing buildings, including naturally affordable housing, and targeted



rental assistance to ensure that affordable housing units are not lost during the pandemic and ongoing economic crisis.

### **Strengthening Systems for the Future Actions**

- Utilize planning dollars, ESG-CV prevention funds, and private funding to partner with systems such as child welfare, justice, health, and education to design and implement targeted prevention and diversion; braiding funding across systems to best serve system-involved individuals and families who are at risk of homelessness, particularly youth and young adults within marginalized communities.

## Policy Shift 2:

# Build, support, and fund dignity-based services led by the communities most impacted by homelessness.

## TOPLINE MESSAGE:

As ESG-CV dollars are used to develop new service delivery models, communities should partner with marginalized community members with lived experience to design the models.

**New performance management systems** should:

- prioritize ongoing feedback from people who are experiencing homelessness
- routinely engage frontline staff in identifying policy and regulatory barrier to serving consumers
- inform policy changes at the local level, workaround of federal regulatory barriers when necessary, and improvements to federal regulation and policy

**Dignity-centered care and service delivery** must become the standard across all services and systems. Dignity-centered care in this context means:

- implementing a holistic approach that fully address the individual or family's self-identified needs instead of providing minimal services to address the needs as prescribed by the provider;
- understanding and responding to the mental and physical effects of systemic and historic inequities;
- prioritizing funding and ongoing supports to organizations led and designed by people from marginalized communities; and
- employing marginalized community members with lived experience of housing instability and homelessness.

## MARGINALIZED POPULATIONS CONSIDERATIONS

Members from several marginalized communities (Native-Indigenous, Pacific Islander, People with Incarceration Histories, and Asian American) explicitly asked for more services provided through organizations led and created by their respective communities. The majority of marginalized communities called for services that understand, respect, and address the historical and current barriers caused by systemic inequity connected to their various identities.

Members from several marginalized communities (Latinx, including undocumented communities,

Black, People Living with Disabilities, and LGBTQ/Trans\*) called for more comprehensive access to health care support in their communities.

All marginalized communities interviewed described harmful interactions with the police while experiencing homelessness and the majority called for the removal of police from the homelessness system.

Members from several marginalized communities (Latinx, including undocumented, People with Incarceration Histories , People Living with Disabilities, Black, Asian American) called for specialized employment services that build networks of well-paying employment opportunities within their communities and address the systemic barriers to employment connected to their identities.

Trans\* community members described ongoing discrimination when accessing basic needs services such as food. Service delivery models must address safe access to basic needs such as food, showers, and bathrooms.

## FRAMEWORK ACTIONS

### Unsheltered actions

- Prioritize directing CARES Act funds to community based-organizations that are led and designed by marginalized communities, offering services in marginalized communities, and employing people with lived experience.
- Mandate that any CARES Act funds used to meet the basic needs of unsheltered persons are safe and accessible to all marginalized communities, particularly Trans\* individuals who often face the biggest barriers to accessing basic needs services such as food, showers, and restrooms.

### Sheltered actions

- Ensure continuity of dignity based services from outreach to emergency housing and through permanent housing.

### Housing actions

- Fund comprehensive employment assistance alongside the housing options being created through the CARES Act and other funding sources. These services should be targeted to and operated by marginalized communities in order to help address the systemic barriers in place for meaningful employment. This should include building networks of fair share employers in marginalized communities and meeting the needs of youth and young adults who may face unique barriers to meaningful employment during the economic recovery and beyond. ESG-CV Rapid Rehousing supportive services is one possible funding source.
- Utilize ESG-CV Rapid Rehousing supportive services funds to leverage partnership with health care providers and community based organizations to build a more comprehensive health/mental health network with providers representative of the

marginalized communities served.

### Diversion and Prevention Actions

- Prevention and diversion services should include financial support and supportive services to kinship networks, as defined by marginalized communities, to include active kin. This should include flexible rental assistance or cash support to kinship networks at the same levels it is available to traditional families and direct cash transfers to individuals that can be used to support housing within kinship networks. Communities should use ESG-CV funds to the extent possible within the regulations, in combination with funds divested from the police and other sources to create these flexible supports to kinship networks as a form of emergency housing assistance, particularly for youth and young adults within marginalized communities.

### Strengthening Systems for Future Actions

- States and jurisdictions that have not expanded medicaid should be aggressively working to do so in order to increase healthcare coverage to better meet the health and behavioral health needs of people experiencing homelessness.
- States and local jurisdictions need to invest in broadband access and device acquisition to ensure access to services. The work of many cities, counties, and states to move people into non-congregate temporary crisis settings during the COVID-19 pandemic serves as a proof point that it is possible to re-imagine the crisis response to homelessness and offer safe temporary options that do not depend on congregate shelters. Communities need to continue and improve upon these efforts with CARES Act funds in order to fully realize a system with no large congregate shelters and adequate safe, temporary, crisis options for anyone in need of shelter in the community.
- The COVID-19 pandemic has exacerbated digital equity issues across the country. Communities of color and other marginalized groups are having tremendous difficulty continuing to access basic supports since the majority of them have transitioned to online administration. In order to address these issues communities need to create immediate plans to invest in broadband access and device acquisition programs for those with the highest need--particularly people who are experiencing homelessness and living with disabilities who may be essentially "homebound" during this time. As mentioned elsewhere, communities divesting from policing and other "public safety" responses to homelessness can use the funds to invest in rapidly addressing these issues.
- Utilize planning dollars and private funding to work with systems partners to learn, adapt, and change together, across systems, to a dignity based model, ensuring that no matter what system is providing the services to an individual or family, it is done under a similar framework. This is particularly important within youth serving systems that often are a feeder into homelessness due to structural racism and inequity within the systems.

## Policy Shift 3:

# Develop affordable housing in the most impacted communities and target housing and rental assistance to those most impacted by structural inequity.

## TOPLINE MESSAGE:

Housing justice agendas must also take into account the historical and systemic racism that have given rise to the precarity that many communities are facing today. This includes redlining policies in housing that kept marginalized communities from owning property and centuries of economic exclusion policies that have kept marginalized communities locked out of the high paying job markets and without generational wealth.

Communities should use CDBG-CV dollars to invest in neighborhoods with high numbers of vacant houses or housing below code in order to create additional housing options for people experiencing homelessness and ESG-CV dollars to target rental assistance to members of marginalized communities to be used in the communities being revitalized and in any neighborhood of their choice. Simultaneously communities should end the decades-long practice of divesting in operating funds. Include long-term operating fund/reinvestment clauses in any new development occurring alongside CDBG-CV dollars. These investments would also allow communities to begin to think about alternative housing development and sustainability models and structures including affordable housing that is fully owned and operated by individuals and housing collectives in the community, removing private landlords from the engagement.

## MARGINALIZED POPULATIONS CONSIDERATIONS

Pacific Island and Native-Indigenous, Asian American community members identified strong cultural and familial ties to multigenerational and extended families and a need for affordable housing that serves all families as defined by any community member.

Black and LGBTQ/Trans\* community members struggle to find affordable housing in areas where they feel safe and have access to needed health care services. They described the need for affordable housing to be connected to the development of marginalized communities and the build out of health care options that are representative of their community.

Latinx, People with Incarceration Histories, and LGBTQ/Trans\* community members reported housing discrimination and rejection from affordable housing based on their gender identity,

lack of immigration documentation, and exclusionary policies on criminal histories. They described the need to develop networks of landlords willing to remove these barriers. They also called for a shift of ownership and operation of affordable housing back to communities, which could include ownership by community based organizations and housing collectives operated by marginalized communities.

People living with a disability described barriers to finding affordable housing that is accessible. They called for communities to prioritize the rehabilitation of inaccessible housing and the development of new affordable housing that meets accessibility needs.

## FRAMEWORK ACTIONS

### Unsheltered actions

- Change coordinated entry practices to prioritize racial equity and ensure marginalized communities more immediate access to permanent housing resources from unsheltered situations.

### Sheltered actions

- Change coordinated entry practices to prioritize racial equity and ensure marginalized communities more immediate access to permanent housing resources from emergency housing, as described above.

### Housing actions

- Target CDBG-CV and HOME funds to the most marginalized communities and zip codes with many vacant or inadequate housing units in order to create safe and affordable housing units in marginalized communities.
- In developing new units, support more community owned and operated affordable housing that utilizes mission-based PHA, community based organization, and other socially owned housing models to help ensure access to marginalized communities free from discriminatory rental policies often used by private landlords.
- Target ESG-CV rental assistance utilizing equitable coordinated entry policies described above and build a network of landlords that will remove barriers to entry such as criminal background, immigration status, and biases towards Trans\* individuals.
- Connect affordable housing options to equity based service models as described above.

### Diversion and Prevention Actions

- Eviction prevention, homelessness prevention, and diversion programs that are offered on a first-come-first served basis often perpetuate inequity in the system. CARES ACT funds used for diversion or prevention activities should be targeted to those most at risk of homelessness, or who have been historically marginalized, not just those at risk of eviction during the current crisis. This risk assessment should as-

sess for for the effects of structural inequity such as:

- high vulnerability to COVID-19 complications
- social determinants of health
- community level factors such as zip code that indicate marginalization and disparities in facing COVID-19 or experiences of homelessness
- involvement in systems with high levels of disproportionality such as child welfare and justice
- lack of access to basic services such as quality, safe housing within a community, employment opportunities, health care, food, and transportation
- Prevention and diversions services should include financial support and supportive services to kinship networks, as defined by marginalized communities to include fictive kin. This should include flexible rental assistance or cash support to kinship networks and direct cash transfers to individuals that can be used to support housing within kinship networks. Communities should use ESG-CV funds to the extent possible within the regulations, in combination with funds divested from the police and other sources to create these flexible supports to kinship networks.

### Strengthening Systems for Future Actions

- Utilize planning dollars and private funding to partner with other systems, such as health care, justice, and child welfare, to create social housing programs that braid funding and utilize cross-system savings to build and sustain affordable housing in marginalized communities.

## Policy Shift 4:

**Divest from policing, remove police from the homelessness response system, and invest a portion of the funds in housing and services to communities most impacted by police brutality.**

### **TOPLINE MESSAGE:**

People experiencing homelessness have consistently reported extremely high levels of unhelpful police engagement; for historically marginalized communities these encounters can too often lead to harassment, violence and death.

As communities plan their ESG-CV and CDBG-CV expenditures it's clear that these dollars should not be used to fund policing activities--inclusive of 'outreach' teams that include police.

Additionally, funds should be actively divested from policing and moved over to budgets to support the creation of housing and community-based supports. These community-based supports include critical services needed to obtain and sustain housing, such as access to economic development, safe and affordable health care, including mental health, and access to quality education.

### **MARGINALIZED POPULATIONS CONSIDERATIONS**

Nearly all marginalized communities interviewed described harmful interactions with police connected to experiencing homelessness and compounded by their marginalized identity, including:

- Black individuals who described a culture of harassment and brutality by police;
- LGBTQ/Trans\* individuals who described the need to avoid police as a means of survival and harassment, threats, and excessive force while experiencing unsheltered homelessness;
- Native-indigenous individuals who described false arrest and police violence;
- People with incarceration histories who described discrimination based on their criminal history and unwarranted arrests and other forms of harassment

The majority of marginalized communities called for the removal of police from the homelessness system, replaced by new investments in community based services to address the needs of people experiencing homelessness.



## FRAMEWORK ACTIONS

### Unsheltered actions

- Police should be removed from all outreach models and communities should utilize CARES ACT funds to support outreach efforts led by organizations that represent the identities of those served and performed by those closest to the work, including youth and young adults. This will require communities to recruit new recipients, offer ongoing support to administer federal funds, and foster partnerships with existing recipients of federal funds.

### Sheltered actions

- Police should be removed from all shelters and emergency housing options and communities should utilize ESG-CV funds for trained crisis workers in emergency housing when necessary.

### Housing actions

- Homeless system partners should fight for divestment from policing, and use a portion of funds divested from policing in their community to support the development of affordable housing in marginalized communities, coupled with economic development and accessible supportive services.
- Communities should consider using funds divested from policing in their community to support direct cash assistance targeted to marginalized community members experiencing homelessness in order to support housing options of their choice.

### Diversion and Prevention Actions

- Homeless system partners should fight for divestment from policing and should consider using funds divested from policing in their community to support flexible rental assistance to kinship networks and direct cash assistance targeted to the historically marginalized community members at-risk of homelessness to avoid evictions and homelessness.

### Strengthening Systems for Future Actions

- As many social service systems such as homelessness, education, mental health, and child welfare, look to remove policing from their service models and re-invest funds, communities should develop comprehensive, cross-system plans that ensure coordination of the investments to build thriving communities among historically marginalized communities. These plans should be designed and implemented with marginalized communities, including those who have experienced homelessness.