



COVID-19 High Risk Subpopulation: Subpopulation during COVID-19 Crisis Response

In order to support communities and the local crisis response to the pandemic, HUD released guidance on prioritizing high-risk groups:

Given the significant public health crisis and the unique circumstances of the COVID-19 pandemic, it may be appropriate for CoCs to prioritize households who are at increased risk for severe illness from COVID-19 based on objective factors.

The COVID-19 High Risk Subpopulation has been created at the local level to identify and target specialized services to persons experiencing homelessness and most at risk of severe illness from COVID-19 in the Austin/Travis County CoC. Following HUD guidance (see [FAQ ID 3735](#)) and using the CDC High Risk Criteria, the local homeless response system will utilize the Coordinated Entry System to refer persons who are identified within the COVID-19 High Risk Subpopulation to Permanent Housing programs.

Weekly, a panel of medical consultants review CDC High Risk Cohort members and through the use of objective factors, assign households to the COVID-19 High Risk Subpopulation group. All current residents of the Protective Lodgings (ProLodges) qualify as belonging to the COVID-19 High Risk Subpopulation due to their assignment through the City of Austin/Travis County Emergency Operation Center (EOC) procedures.

The Coordinated Entry system prioritizes the COVID-19 High Risk Subpopulation for Permanent Housing programs that receive funding as a part of the COVID-19 crisis response.

COVID-19 Dedicated Funding Sources Include:

Agency	Funding Source	Project Type
Family Eldercare	TDHCA ESG-CV	RRH
Downtown Austin Community Court (DACC)	COA ESG-CV	RRH
Communicable Disease Unit (CDU)	COA ESG-CV	RRH
LifeWorks	TDHCA ESG-CV	RRH
Foundation for the Homeless	TDHCA ESG-CV	RRH
BSS+ Collaborative	COA ESG-CV	RRH

HUD is relying on the CDC's guidance for People with Certain Medical Conditions (dated July 17, 2020) as the basis for identifying certain persons who are at increased risk of severe illness from COVID-19. HUD expects continued revisions to CDC guidance based on evolving data and understanding of COVID-19; and will follow updated guidance released by the CDC.

Given the urgency of the present situation and taking into account the specific subpopulations served by HUD's homelessness programs and demonstrated impact homelessness has on aging, it may be permissible to prioritize the following categories of persons for assistance; **provided that the process follows federal nondiscrimination requirements.**¹

A CoC that chooses to incorporate any of these additional objective factors must clearly identify and incorporate the specific factors into its CE process and work with its providers to ensure uniform questions are asked consistently of all potential clients.

The Austin/Travis County CoC will utilize the CDC High Risk criteria to identify persons who would fall into the approved CDC High Risk subpopulation by meeting the high-risk criteria. The Coordinated Entry system creates and maintains a list of all households who have met any of the high-risk conditions (**CDC High Risk Cohort**).

Case Conference & Staffing:

The cohort concept is used to further narrowed into a more COVID-focused subpopulation to better match programs and services to meet the needs of those most impacted by COVID-19 and do so by using objective criteria and guidelines. Persons who meet the characteristics of the **COVID-19 High Risk Subpopulation** are identified through a case conference process. The **COVID19 Support Request Group**; a group consisting of medical professionals, outreach workers, and coordinated entry staff; discuss cases using objective criteria that goes beyond the high-risk criteria. Persons who are categorized within the subpopulation will receive intensive support to ensure they have immediate access to the Coordinated Assessment process and be referred to programs and services dedicated to the COVID-19 crisis response. All households will continue to be prioritized based on the existing [Austin/Travis County CoC Coordinated Entry Written Standards](#).

HUD has approved the process in which CoCs prioritize for assistance persons who fall under the subpopulation category identified – if the process meets all CE program requirements, including:

- Ensuring that the criteria are applied uniformly throughout the CoC to all households being prioritized
- The process is applied consistent with federal nondiscrimination requirements

CDC High Risk of COVID-19²³

Adults of any age with **certain underlying medical conditions** are at increased risk for severe illness from the virus that causes COVID-19. Severe illness from COVID-19 is defined as hospitalization, admission to the ICU, intubation or mechanical ventilation, or death.

Adults of any age with the following conditions **are at increased risk** of severe illness from the virus that causes COVID-19:

¹ <https://www.hudexchange.info/faqs/3464/my-coc-needs-to-prioritize-households-to-meet-the-requirements-of-hud/>

² <https://www.hudexchange.info/faqs/3735/are-there-actions-a-continuum-of-care-may-take-within-its-coordinated-entry/>

³ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

- [Cancer](#)
- [Chronic kidney disease](#)
- [COPD \(chronic obstructive pulmonary disease\)](#)
- [Down Syndrome](#)
- [Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies](#)
- [Immunocompromised state \(weakened immune system\) from solid organ transplant](#)
- [Obesity \(body mass index \[BMI\] of 30 kg/m² or higher but < 40 kg/m²\)](#)
- [Severe Obesity \(BMI ≥ 40 kg/m²\)](#)
- [Pregnancy](#)
- [Sickle cell disease](#)
- [Smoking](#)
- [Type 2 diabetes mellitus](#)

Objective Factors: Identifying COVID-19 High Risk Subpopulation

CoCs may choose to incorporate additional objective factors into their CE process to address the impact of COVID-19 on individuals and families experiencing homelessness or are at-risk of homelessness.

Permissible objective factors may include any of the following factors:

1. Elevated risk of transmission at the location where the person is currently living (e.g., on the street, in a congregate setting such as a shelter, jail, or prison, or other arrangements)
2. Inability to take steps to avoid transmission where the person lives or works (e.g., multiple people sharing a sleeping space, work or living environment with close physical interactions and inadequate personal protective equipment (PPE), or living in a place without access to running water)
3. Lack of access to healthcare (e.g., lack of health insurance, lack of primary care provider, or use of ER for all medical care)The COVID-19 Support Request Group will be responsible for ensuring the case conferencing and staffing procedures follow and adhere to identifying COVID-19 High Risk Subpopulation members based on the objective criteria approved by HUD. Objective factors may be considered more urgent than others and be used to further prioritize households who fall within the subpopulation criteria.

IMPORTANT: Federal Nondiscrimination Requirements

CoCs are prohibited from using the prioritization process to discriminate based on protected classes as defined by federal civil rights laws and requirements. These protected classes include race, color, religion, national origin, sex, age, familial status, or disability, as well as compliance with [HUD's Equal Access Rule](#). For example, CoCs and housing providers must provide reasonable accommodations for individuals with disabilities. Recipients of HUD funding must also ensure that designated accessible units are prioritized for individuals with mobility or sensory impairments who need the accessibility features of these units. For more information on the prioritization stage and fair housing requirements more generally, see [FAQ ID 3464](#).

Identifying COVID-19 High Risk Subpopulation

