



Housing Resources During COVID-19 for Human Trafficking Survivors

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

The Impact of COVID-19 on Housing Access and Stability

COVID-19 has disrupted the traditional ways people work, socialize, and live, exploiting existing vulnerabilities and highlighting a need for innovative practices within service delivery responses. Prior to the COVID-19 pandemic, survivors and service providers identified a lack of safe and affordable housing options as a barrier that prevents people from leaving exploitative situations or attaining economic mobility. COVID-19 has further constrained access to safe housing and stability as shelters enact social distancing guidelines and survivors with reduced working hours or unemployment struggle to afford housing costs, putting them at risk of eviction.

As one indicator of increased need, emergency shelter requests received by the National Human Trafficking Hotline increased from 38 cases in January to 43 cases by April. In April 2020, requests for emergency shelter represented 63% of crisis service requests, up from 50% in January.

Adapting Congregate Care Settings to Public Health Guidelines

Congregate care settings like shelters are employing strategies to reduce the risk of a COVID-19 outbreak, such as:

- Limiting enrollment of new clients in the program
- Repurposing county buildings or partnering with hotels to maximize shelter space
- Encouraging social distancing and the use of cloth face coverings in shared settings
- Moving activities outdoors to reduce the risk of transmission during programming
- Shifting staffing schedules to minimize staff overlap

For additional strategies, review the Centers for Disease Control and Prevention's (CDC) [COVID-19 Guidance for Shared or Congregate Housing](#).

Leveraging Hotels to Meet Clients' Needs

Reductions in travel and increased vacancies caused by the pandemic create an opportunity for shelters to partner with local hotels to expand housing access for survivors temporarily. Hotel rooms and apartments can be used to quarantine sick clients or house new and existing clients while maintaining appropriate social distancing practices.

Technology platforms like the [Safe Shelter Collaborative, funded through the Department of Justice's Office for Victims of Crime](#), offer a means to source funding for hotel stays, but service providers may also want to explore flexibilities¹ with their funders to identify how existing funds can be used to expand access to emergency shelter.

Prior to placing clients in hotels, providers should consider:

- How case management and services will be provided to survivors during the hotel stay
- How to build a relationship with a hotel before placements occur
- How to establish a clear understanding with clients about what to expect during a hotel stay and how they will receive services
- How to ensure survivors' safety, respect their confidentiality, and incorporate trauma-informed practices throughout their hotel stay

Considerations for Service Providers Partnering With Hotels

Partnerships between service providers and hotels are mutually beneficial — service providers access new options for emergency shelter, which increases the number of clients they can serve, while hotels increase their occupancy rates and revenue.

When building a relationship with hotels, service providers could provide education on human trafficking, confidentiality, and safety protocols. Providers should negotiate an agreement with the hotel that establishes a payment rate and process, access to amenities, communication channels, and protocols that ensure safety and confidentiality.

As they develop an agreement, service providers and hotels may want to consider:

- Whether to rotate the rooms reserved for use by the service provider to reduce likelihood of identification²
- Under which name survivors will register for their room (e.g., using standard name for all clients)
- What security protocols are in place at the hotel
- Who is responsible for property damage

Service providers will also need to identify an appropriate place to provide case management and a strategy to deliver prepared meals, groceries, or gift cards to clients. This will depend upon the space and amenities that the client can access, such as a microwave or stove. Clients staying in hotels will not have access to the same on-site support as clients living in shelter settings — it is important to assess with survivors whether a hotel is an appropriate housing option for them.

Before placing survivors in a hotel, service providers should establish clear expectations with the client for their emergency stay. This may include the development of a hotel stay

¹Federal agencies like the Administration for Children and Families have issued [guidance](#) on grant flexibilities including no-cost extensions, abbreviated noncompetitive continuation requests, allowable salaries and other project activities, permissibility of costs not normally chargeable to awards, and extension of financial, performance, and other reporting.

² To minimize disruption to clients, the service provider and hotel staff could rotate the room block every time clients check out to reduce the likelihood that other hotel guests can identify survivors' room locations.

agreement that clearly outlines policies of the hotel and program. Survivors and hotel staff should be made aware of appropriate emergency contacts.

Eviction Prevention and the Impact of COVID-19 on Housing Stability

As states across the nation continue to progress through a phased reopening of their economies, survivors of human trafficking and their families may lack dependent care, which prevents their return to work; may have been furloughed or laid off; or may be experiencing other barriers that create economic instability within their household.

Eviction and Exploitation Risk

Survivors of human trafficking may be at greater risk of economic disruption and hardship due to COVID-19, based on demographic and other factors³. Survivors are more likely than the general population to have work duties that cannot be performed at home, lack paid sick days, and have minimal or no emergency savings for essential items like food and housing⁴. Stay-at-home orders may also exacerbate existing tension and violence within homes, leading to increased rates of youth and families seeking safe housing.

Several federal and state actions address eviction issues, which are discussed further in this document. Even with these actions, it is important to acknowledge that the economic pressures of the pandemic may create opportunities for exploitation, such as landlords coercing their tenants into trading sex for rent relief as described in a [blog post](#) by the National Human Trafficking Hotline operator, Polaris.

[Sexual harassment](#) within housing takes on many forms and is prohibited under the Fair Housing Act. The Fair Housing Act applies to most housing and residential real estate transactions, and its coverage includes private housing, housing that receives federal financial assistance, and state and local government housing. If you or a client has experienced sexual harassment or another form of illegal housing discrimination, you can [file a complaint](#) or review guidance on the [tenant rights laws and protections](#) in your state.

Partnering With Survivors to Meet Their Housing Needs

As survivors and their families enter or re-enter care, providers should review their policies and practices to ensure service delivery is empowering and responsive to survivors' needs. Service providers should consider the following when working with their clients:

- Are survivors included in determining where and how they are housed?
- How are providers balancing the need for safety and flexibility within their programs?
- Are program policies and practices centered on the needs of survivors?

³ Emerging [research](#) suggests that Black, Indigenous, and Latino communities of color are impacted disproportionately by COVID-19.

⁴ Survivors of human trafficking are more likely to work in industries that increase their risk of exposure to COVID-19 or pandemic-related unemployment like manufacturing, agriculture, and domestic work. United Nations Office on Drugs and Crime. Impact of the COVID-19 Pandemic on Trafficking in Persons: Preliminary findings and messaging based on rapid stocktaking. (n.d.). Retrieved from https://www.unodc.org/documents/Advocacy-Section/HTMSS_Thematic_Brief_on_COVID-19.pdf

- What local resources are available to meet clients' needs?
- Are there potential partners in the community who could fill a service gap created or exacerbated by COVID-19?

The [Housing and Economic Mobility Toolkit](#) provides more information on building non-traditional partnerships to fill service gaps, as well as guiding principles and strategies for working with survivors of human trafficking.

Expansion of Housing Resources Through the CARES Act

The President signed the Coronavirus Aid, Relief, and Economic Security (CARES) Act on March 27, 2020, which provided 120 days of eviction relief for tenants in multifamily rental housing that is federally insured or backed. While the 120-day eviction moratorium ended on July 25, tenants must be given 30 days to leave the property, making the earliest date of removal August 24, 2020.

Additionally, on September 4, 2020, the CDC issued an [Order](#) under Section 361 of the Public Health Service Act to temporarily halt residential evictions through December 31, 2020. Tenants, lessees, or residents of properties covered under the Order can fill out the [declaration form](#) and provide an executed copy to their landlord to prevent eviction or removal. Many states and local jurisdictions have also passed legislation that prevents proceedings from occurring for evictions that are based solely upon nonpayment of rent during the pandemic. Princeton University's Eviction Lab has compiled information on local eviction moratoriums through a [COVID-19 Housing Policy Scorecard](#).

The Department of Housing and Urban Development (HUD) developed an [Eviction Prevention and Stability Toolkit](#) for public housing agencies and landlords. Renters experiencing financial challenges due to COVID-19 may call **877-542-9723** to speak with a Housing Counselor in the Disaster Response Network if the property is located on one of HUD's database maps:

- [Multifamily Assisted Properties](#)
- [FHA-Insured Multifamily Properties](#)
- [Additional Properties](#)

The CARES Act allocated \$4 billion for HUD's Emergency Solution Grants, \$5 billion for HUD's Community Development Block Grant program, and \$200 million for supplemental funding provided to local jurisdictions by the Federal Emergency Management Agency (FEMA). The Administration for Children and Families received \$25 million for the [Runaway and Homeless Youth Program](#) to provide critical supportive services and shelter, \$45 million for the [Family Violence Prevention and Services Program](#) to provide temporary housing and assistance, and \$900 million for the [Low Income Home Energy Assistance Program](#) to assist with home energy needs.

HUD Resources

- **Continuums of Care** assist individuals and families experiencing homelessness achieve long-term stability through permanent housing, transitional housing, supportive

services, and homelessness prevention programs. [Find a local CoC](#), and [find a shelter](#) near you with this HUD map resource

- **Emergency Solution Grants (ESG)** fund street outreach, homelessness prevention, shelter operations, essential services to shelter residents, and rapid re-housing. Visit the [HUD Exchange website](#) and select your state to find ESG programs in your community.
- **Community Development Block Grant (CDBG)** program provides funds to state and local governments, who have broad flexibility to determine how they will use these funds to provide community assistance in response to COVID-19. CDBG funds can be used for a wide variety of activities, including emergency housing assistance, housing counseling, employment training, health services, support services for domestic violence survivors, child care services, and food banks, just to name a few. Visit the [HUD Exchange website](#) and select your state to find CDBG programs serving your community.
- **Housing Counseling** agencies approved by HUD provide advice on renting, buying a home, defaults, evictions, and credit issues. [Find a counselor](#).

FEMA Resources

- The **Public Assistance Program** provides [supplemental grants](#) for local communities to quickly respond to and recover from major disasters and emergencies like COVID-19. As part of the CARES Act, FEMA announced \$200 million [supplemental funding](#) for the **Emergency Food and Shelter Program** to supplement that provide critical resources to people experiencing economic emergencies.
- FEMA, HUD, and CDC published [guidance](#) on accessing Federal resources and funding priorities for non-congregate sheltering. FEMA also developed a [resource](#) answering frequently asked questions about non-congregate sheltering during the COVID-19 public health emergency.

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