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**Comments of the National Policy and Advocacy Council on Homelessness
Submitted to the U.S. Interagency Council on Homelessness
Federal Strategic Plan to End Homelessness**

Overview:

President-elect Obama has made a commitment to reduce poverty during his time in office. Efforts to reduce homelessness during the Obama Administration should be viewed as part of this more comprehensive anti-poverty agenda. Viewing the “problem” of homelessness in this way points us to the solution – ensuring that the wide range of federal anti-poverty programs are working to prevent and end homelessness, while simultaneously making sure that the smaller but still significant federal homeless assistance programs are operating effectively.

The U.S. Interagency Council on Homelessness (USICH), through its Executive Director and other staff, is best positioned to coordinate the comprehensive efforts of a broad range of federal agencies to combat homelessness. This coordination should be a major part of the ICH’s work during the Obama Administration.

But development of a Federal Strategic Plan to End Homelessness (FSP) is not sufficient. A plan is not a home. Without the federal resources necessary to implement the plan, it cannot be successful.

The Current State of Federal Homelessness Policy:

Under the previous Administration, homelessness was viewed in isolation from affordable housing programs and from other federal anti-poverty policies. As a result, tiny increases in HUD homeless assistance grant funds were treated as evidence of a commitment to end long term street homelessness, even as all of HUD’s other housing and community development programs saw funding cuts, and other federal programs designed to help low income people were not brought to bear to help end homelessness.

Here are two key examples. Despite the role of disability benefits in providing mentally ill homeless persons with financial support and medical insurance, the Administration never adopted initiatives to make those benefits easier to access for those homeless people who are clearly qualified. And even though TANF benefits can play a major role in preventing and ending family homelessness,

the Administration declined to work with states to make sure that more poor and/or homeless families received TANF benefits and the host of supportive services that can come with TANF eligibility. Unfortunately, many more such examples exist.

From 2001-2008, we saw the result of these policies. The Bush Administration's ten year "plan" to provide 150,000 units of supportive housing for single, disabled, long term homeless individuals is not even close to half complete, after nearly a decade. Worse, little new money was provided for this initiative. Instead, funds were diverted from programs providing housing to homeless families and programs offering supportive services to all homeless populations. This "robbing Peter to pay Paul" strategy was not effective, and will never be

The Obama Administration: A New Opportunity

The creation of the FSP provides an opportunity to rethink the way the federal government addresses homelessness. With the economy in crisis, foreclosures rising, and more than one million children homeless over the course of a year, we can no longer afford a goal that is limited to "ending chronic homelessness" for single adults living on the street. It remains unconscionable that, in a country with so much wealth (even during this period of crisis), we have individuals and families sleeping outdoors and living in situations that are both temporary and dangerous – to the point that they could be forced to leave at a moment's notice, with no place to go except the streets. We must maintain a broad focus that covers everyone who is homeless.

Here are four key principles that can help guide new efforts to address homelessness:

- **Clearly state a goal of preventing and ending homelessness.**
- **Accurately define the scope of the problem.** The former Administration preferred to define "homelessness" narrowly, allowing them to falsely claim success while actually providing assistance to fewer and fewer people. But excluding people from a definition doesn't make those people disappear – they remain in desperate need. It is far better to identify everyone who is homeless, and then adopt realistic strategies to reduce the number of individuals and families requiring assistance.
- **Adopt different strategies to help different homeless populations.** More detail on this point is provided later on in the memorandum, but the key take-away should be that one size fits all solutions simply won't effectively end homelessness. A new veteran being discharged from the military with PTSD may need stable transitional housing plus access to mental health treatment, until she settles down in a new community and eventually finds a good job. On the other hand, a single mother with two kids might need a long term rental subsidy along with childcare assistance and the ability, under TANF rules, to pursue a college education.
- **Understand that homelessness looks different in different communities.** Everyone who is homeless needs permanent housing and a set of supportive services ranging from minimal to intensive. But the demographics of homelessness are different in cities, suburbs, and rural areas across the country. This can even be true between two major cities such as New York and Chicago, and it is certainly true between a city like Los Angeles and a rural area in Alabama. The implications of this understanding are as

follows – communities should be given significant flexibility in how they use federal funds to prevent and end homelessness, so long as they maintain rigorous accountability. In this context, accountability means that a community can demonstrate that federal dollars are being used to serve the full range of homeless populations within its borders, in an effective manner.

A FSP that develops typologies of homeless persons and prioritizes particular populations, offering one size fits all solutions, will not be successful. Instead, the Plan must ensure that federal agencies and programs are coordinated in a way that permits people in local communities with the flexibility to address homelessness as it appears in their areas.

A Detailed Plan to Reduce Homelessness:

As discussed above, developing a new rhetoric around homelessness policy is critical. Good rhetoric will build public support for wise policy solutions. In these troubled times, people are no longer looking for quick fixes or forced optimism in the face of clear challenges. Instead, Americans want an accurate understanding of the problems we face, coupled with real policy changes that will improve people's lives.

The following strategies will provide a roadmap for reducing homelessness. At the conclusion of this memo, NPACH offers a summary of additional agency actions that could greatly improve the lives of many individuals and families who are homeless. Eleven out of fifteen cabinet agencies have one or more programs that impact homeless persons. The USICH is best positioned to ensure that all of these agencies are moving in the same direction – towards ending homelessness in America.

Key Opportunities to Reduce Homelessness:

These strategies would help all homeless persons – individuals and families with children.

1. Keep people housed.
 - **Implement a new foreclosure prevention program.** Families are losing their homes to foreclosure, leaving them with no place to live. Many are becoming homeless. We must provide meaningful federal support to help keep more of these families in their homes, to include permitting bankruptcy judges to modify mortgages on primary residences. Unfortunately, existing programs overseen by the Treasury Department have not provided effective relief to homeowners in need. These programs should be revamped.
 - **Provide additional HPRP funding.** The impact of the Homeless Prevention and Rapid Re-Housing Program (HPRP) is just beginning to be felt at the local level. However, early signs of the program's effectiveness are already present. In a number of jurisdictions, including San Diego, CA and Fairfax County, VA, HPRP dollars are

being used in partnership with educators to ensure that youth in need of housing are getting that assistance.

However, HPRP is not perfect. It appears that HUD is requiring communities to be overly selective in determining which individuals and families qualify for assistance, preventing people in real need, who would otherwise qualify for the program, from getting help. These policies must be re-examined, to ensure that the program can work as effectively as possible to meet the wide range of recession-driven needs.

2. Provide new housing opportunities.

- **Provide new Section 8 vouchers each year, dedicating a percentage of these vouchers to individuals and families who are already homeless.** Some cities, such as New York City, have stopped providing vouchers for homeless persons, reasoning that the availability of housing subsidies was causing people to deliberately become homeless. This line of reasoning is generally implausible, given the struggles that families face once they become homeless – few if any people would go to a homeless shelter if they had any other housing option available to them, even if going to a shelter meant that a housing voucher “might” be available months down the road.

The President’s proposed budget for FY 2011 takes an important step, offering 10,000 new Section 8 vouchers to assist individuals and families who are homeless, and promoting interagency collaboration by requiring Public Housing Agencies to demonstrate that they are working with key local partners such as educators, TANF agencies, and mental health agencies in order to receive the vouchers.

But at the same time, the FY budget 2011 marks a retreat. The funding dedicated to these demonstration vouchers appears to have effectively replaced dollars dedicated to HUD-VASH Section 8 vouchers that are targeted to severely disabled homeless veterans and Family Unification Program (FUP) Section 8 vouchers that prevent homelessness by reuniting parents who have lost children to foster care due to a lack of housing with their children, and providing time limited housing for youth aging out of foster care. And no new “regular” Section 8 vouchers were requested. In order to make meaningful progress towards ending homelessness, funding must be augmented - not simply shifted from one set of vouchers to another set.

- **Produce new units of housing for homeless individuals and families.** This can be done by funding the National Housing Trust Fund, by relying on the Low Income Housing Tax Credit (LIHTC) program, paired with rental subsidies (once the LIHTC program gets back on its feet), and by passing the Homes for Heroes Act – a bill whose lead Senate sponsor was President-elect Obama, that would establish a HUD program to provide new permanent housing for homeless veterans and their families. Many of these veterans are single adults with one or more children.

- **Use other HUD programs creatively.** Programs such as HOME and CDBG can be used to provide additional affordable housing opportunities that will prevent and end homelessness.
3. Restore the social safety net.
- **Make TANF work again for all families.** TANF should be the safety net that prevents many families from becoming homeless. A well operated TANF program can pay a critical (though very small) monthly cash benefit, provide childcare so that a head of household can work or pursue an education, and provide linkages to housing, transportation and other services. Unfortunately, most TANF programs are not run in this way. Recipients receive their monthly benefits, with few to no supportive services, and move closer and closer to their 5 year TANF time limit. The federal government needs to work with states to make sure that TANF programs are working to both prevent and end homelessness for families.

- **Make health care available for everyone.** Most homeless families should qualify for Medicaid, but many are not enrolled due to red tape and other barriers such as lack of ID and other documentation. We must make sure that all these adults and their children receive quality coverage – coverage that is portable and that does not require overly frequent re-certifications. Single individuals face similar challenges. Non-disabled individuals are not typically qualified for Medicaid, and singles with disabilities face an enormous bureaucratic burden trying to prove that they are in fact disabled.

Existing health care reform legislation would extend coverage to all Americans at or below at least 100 percent of poverty. Providing health care is a homelessness issue, and efforts to pass these bills cannot be abandoned.

- **Extend unemployment benefits.** A significant percentage of homeless people are employed, and there are many people at great risk of losing their jobs who live so close to the edge that losing a job could result in them becoming homeless. An extension of unemployment benefits would help people in both categories obtain or maintain housing and stabilize their lives. Federally subsidized “extended” unemployment benefits expire at the end of February. An additional extension is critical.

Additional Agency By Agency Actions to Reduce Homelessness:

HUD:

Funding for HUD’s homeless assistance programs is a bedrock of federal efforts to end homelessness. The proposed increase of roughly \$200 million in the President’s FY 2011 budget is a promising start, though it is insufficient to fully implement the new HEARTH Act while holding harmless current McKinney-Vento programs and grantees.

It will also be important that the new HEARTH Act regulations are written to provide sufficient community flexibility in utilizing the newly broadened HUD definition of homelessness and in other key areas – such as the redesigned Emergency Solutions Grant (ESG) program. We must make sure that lessons learned from HPRP are applied when ESG regulations are drafted.

HHS:

The PATH homeless outreach and engagement program is working well and should be expanded. The same is true for SAMHSA's other homelessness activities, focused on people with mental health or co-occurring disorders. And states should be encouraged to better use large substance abuse and mental health block grant funds to serve homeless persons.

Homelessness among families is impacted significantly by the success or failure of major HHS programs that are often administered locally, such as TANF and dollars that go for child welfare or to ameliorate domestic violence. Federal administrators of these funding streams must work carefully and closely with HUD to ensure that federal programs can be effectively used, at the local level, to prevent and end homelessness.

In addition, HRSA's Health Care for the Homeless program should be expanded as part of comprehensive health reform. And Head Start and other early childhood programs should maintain a focus on enrolling homeless children.

Education:

Funding should be increased for the Education of Homeless Children and Youth (EHCY) program, with a goal of ensuring that every school district can employ as many liaisons as are necessary to identify and work with the local population of homeless students. Increased coordination between HUD and the Department of Education is also critical, to ensure that homeless children, youth, and families are provided with the housing assistance they need.

VA:

VA should increase the number of beds in its successful Grant and Per Diem program that provides homeless veterans with transitional housing. VA should also coordinate with the Department of Defense to ensure that no American becomes homeless upon discharge from the armed forces. VA Secretary Shinseki's five year plan to end veterans' homelessness is commendable. We must work together to ensure that funding and policy changes are coupled together in a manner that allows us to meet this goal.

Defense:

The Department of Defense has more discretionary resources than any other federal agency. We should expect the agency to commit a tiny portion of these resources to ensure that individuals being discharged from military service do not become homeless immediately after they leave the armed forces. DoD could also be asked to contribute funds to HUD or VA efforts to house homeless veterans, particularly those veterans with PTSD or other mental health disorders attributable to military service.

Labor:

Labor should increase funding for the Homeless Veterans Reintegration Program (HVRP) – a small but important program that provides job training to homeless veterans so that they can obtain employment and in most cases leave homelessness behind. Labor must also do a better job of encouraging states to use Workforce Investment Act (WIA) funds to ensure that job training is provided to people who are homeless, especially people with severe barriers to employment. States are reluctant to serve this population, because it hampers their ability to meet program benchmarks – but doing so is vital. If necessary, WIA goals should be adjusted to provide incentives for serving more homeless persons.

Agriculture:

USDA must ensure that all eligible homeless persons can access the food stamp (now “SNAP”) benefits to which they are entitled. Expedited food stamp eligibility for all eligible homeless persons should be restored. All eligible homeless children and youth should also be enrolled in USDA child nutrition programs, including school lunch and summer meals.

Justice:

The Department of Justice should fund and then swiftly implement the programs authorized under the newly enacted Second Chance Act. These prisoner reentry programs will help prevent homelessness. DOJ should also monitor local efforts to criminalize homelessness, as well as efforts to burden the ability of homeless persons to exercise fundamental rights such as the right to vote. And the Office on Violence Against Women should be encouraged to pursue additional collaboration with HUD, focused on housing for victims of domestic violence.

Social Security Administration (SSA):

SSA must reform its disability programs to ensure that more qualified applicants receive the benefits they are due more quickly – under the current system, clearly disabled claimants continue to wait up to two or more years for an in person hearing that often results in an award of benefits. Dealing with the complex SSA application process is especially difficult for homeless persons, particularly without an advocate. SSA should join HHS efforts to ensure that more service providers are trained to assist homeless applicants for disability benefits, and should adopt an expedited procedure for processing claims filed by people who are homeless.

Department of Homeland Security (DHS):

One barrier faced by homeless persons in accessing many of the key programs discussed above is the lack of proper identification, typically because ID has been lost and homeless persons cannot obtain the documents necessary to receive a replacement. DHS is responsible for working with states to implement the Real ID law – a law requiring states to adopt more stringent procedures for verifying identity before providing people with drivers licenses and state ID cards. In implementing Real ID, DHS must be sure that procedures are put in place so that homeless persons who need to obtain ID are not prevented from doing so. Also, FEMA operates the Emergency Food and Shelter Program (EFSP), a successful homelessness prevention program which should be preserved.

U.S. Postal Service (USPS):

Access to mail is critical for homeless persons. It allows them to receive information on benefits and other key services. Unfortunately, USPS policies make it unduly difficult for homeless persons to rent available P.O. Boxes, and to obtain mail service through general delivery. These policies should be modified, to facilitate access to the mails for homeless people.

Making significant reductions in homelessness will not be easy. But it should not be viewed as a “pipe dream” or “pie in the sky.” Implementing the solutions discussed in this memorandum will result in significant progress. NPACH looks forward to working with the U.S. Interagency Council on Homelessness to make that progress a reality.