

October 2, 2017

Dear Member of Congress:

The U.S. Department of Housing and Urban Development (HUD) recently responded to a letter, which you signed, to Secretary Ben Carson regarding homelessness assistance programs. The National Coalition for Homelessness Solutions is a group of homelessness assistance providers deeply concerned with current homelessness assistance policy and its impact on families, youth, and children experiencing homelessness. In our view, the letter from HUD was non-responsive to the issues you raised and dismissive of your concerns. It also contained a number of statements that are simply not accurate. This letter is intended to point out the major flaws in HUD's response and affirm the need for homelessness assistance reform.

The Claim of Local Control

HUD states that it bases all of its homelessness assistance programming and decisions at the local level in partnership with local Continuums of Care (CoCs). It claims that it provides little direction on local decision making and only promotes good performance, best practices, and fiscal responsibility. This is simply not true.

HUD theoretically allows communities to determine what their local rating and ranking criteria will be and how to apply them. But in fact, HUD promulgates significant and complex policy guidance that communities must follow in order to receive funding. HUD's investment in setting the rules of the game is so significant that local funding decisions become skewed to reflect HUD's national priorities. These rules cause programs and CoCs to set ratings and rankings such that HUD's policies and preferences are saluted, with little room for local discretion. Local decision-making that does not align with HUD priorities will result in a lack of funding. Essentially, HUD sets policy through the NOFA and its technical, labyrinthian, guidance, resulting in significant federal overreach.

HUD's letter states: "Housing First approaches are widely promoted in the homeless assistance field, with many existing programs changing their program models, and most new homeless programs using Housing First Approaches. While the Department has helped, most of the adoption of Housing First is a result of communities seeking better performance and reduced homelessness. Most community plans are based on using Housing First approaches."

This suggests that communities are happy to use the Housing First approach. However, there is no evidence that "most" of the adoption of Housing First is voluntary. Indeed, the very reason that Members of Congress were prompted to write a letter to the Department was concern for local programs who have had to either abandon their program model - regardless of their exemplary outcomes in truly ending poverty and homelessness for families and individuals - or lose federal funding. Thus, the Department has done more than "help" communities to adopt Housing First; it has created sweeping incentives and programmatic requirements. Primarily, HUD uses its NOFA to impose its priorities on communities. For example, the FY2017 Notice of Funding Availability (NOFA), makes clear that local priorities, in and of themselves, will not be honored, and that local communities must heed HUD's priorities if they are to be competitive for funding. In this way, HUD ultimately determines the projects that are likely to receive the most

funding (Tier I), and those who are less likely (Tier II). The NOFA and the ranking and rating criteria provides a strong incentive for CoCs to require project applications to adopt a Housing First approach; in establishing this point system in its funding criteria, HUD essentially forces communities to adopt its priorities.

In addition, HUD announced that in the FY2017 NOFA, communities could apply for a [new type of project](#) that combines the activities of a transitional housing project with those of a rapid re-housing project. However, even in this new project type, HUD imposes Housing First by stating plainly that competitive programs cannot require participants to participate in treatment or services to receive assistance.

Finally, Housing First approaches are promoted in the homeless assistance field because HUD employs a \$56 million technical assistance arm to advance its views. Because the HUD NOFA is so difficult for communities to implement, an army of government funded experts have been deployed that serve to promote HUD's preferred approach.

In sum, HUD homeless assistance policy, as promulgated through the NOFA and through HUD technical assistance, is not about performance and outcomes, but ideological preferences that displace many effective providers. Providers of services to families with children have been particularly disadvantaged by this policy and program approach.

The Claim of Effectiveness and High Performance

Despite the claims, no evidence exists that demonstrates Housing First is responsible for declines in homelessness counts across the nation – in fact, a preponderance of evidence points to increasing homelessness, suggesting that Housing First is not the panacea proclaimed by HUD. The touted reduction in the numbers of homeless people counted in HUD's "Point in Time" counts is more likely attributed to the narrow federal definition of homelessness that only includes those who are visibly homeless – biasing funding against families, youth and children. Other federal agencies do a much better job of tracking those experiencing homelessness. In fact, according to Department of Education data, homeless children and youth have increased 100 percent since 2006. The increase in the number of homeless children in Head Start is about the same. These data can be used as a proxy for homeless families. Even the supposed decreases in chronic homelessness among single adults appear to be short-lived: cities such as Seattle, New York City, and others have declared states of emergency over their rapidly escalating homeless numbers, and the National League of Cities recently released [a report](#) that showed that the homelessness rate has increased in more than a quarter of 224 cities surveyed.

A New Approach is Needed: Address Root Causes & Measure Incomes

Many local service providers know that identifying and addressing underlying causes of homelessness is a better approach to solving homelessness, and that homelessness will decrease only when its many root causes are addressed. For decades, community-based programs have worked to address those root causes, and successfully transform the lives of those living in deep poverty from consumers of public assistance to productive members of society. These outcomes, however, are not measured, considered, or rewarded by HUD. Instead, HUD has decoupled homelessness from poverty, treating homelessness as primarily - if not exclusively - a housing

problem. The greatest victims of this approach are the children, youth, and families who have taken last seat in HUD homeless assistance policy, and whose futures are jeopardized by it.

We urge you to continue to advocate for meaningful reforms to HUD Homeless Assistance to end the current “one size fits all” federal overreach, including: 1) advocating for report language in any final omnibus FY2018 appropriations bill to restrict HUD’s ability to impose national priorities for populations or program models, including Housing First, on local communities; 2) signing on as a co-sponsor to H.R. 1511, the Homeless Children and Youth Act; and 3) requesting an oversight hearing in the Housing Subcommittee of the Financial Services Committee on HUD’s homelessness assistance programs and how these programs have increased the number of families and children experiencing homelessness.

Thank you for your commitment to real solutions to homelessness in the United States. Please contact Paul Webster at 760-696-2445 or pwebster@solutionsforchange.org for additional information.

Sincerely,



Paul Webster

National Coalition for Homelessness Solutions
Vista, CA

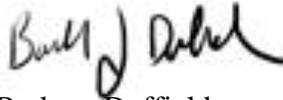


Michele Steeb

St. John’s Program for Real Change
Sacramento, CA



Christopher Fay
Homestretch, Inc.
Falls Church, VA



Barbara Duffield
School House Connection
Washington, DC



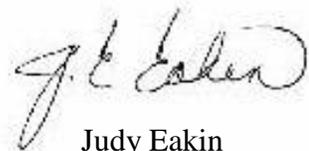
Stephanie Staats
YWCA Delaware
Wilmington, DE



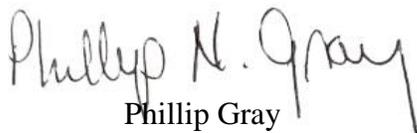
Katie Allston
Marian House
Baltimore, MD



Bruce Lesley
First Focus Campaign For Children
Washington, DC



Judy Eakin
HEARTH Homes
Glenshaw, PA



Phillip Gray
Foundation for Affordable Housing, Inc.
Lexington, KY



Kari Whitacre
Community Outreach, Inc.
Corvallis, OR