



NATIONAL LOW INCOME HOUSING COALITION

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The following comments are submitted on behalf of the National Low Income Housing Coalition (NLIHC) in response to the United States Interagency Council on Homelessness's (USICH) request for public input to revise the federal strategic plan to prevent and end homelessness.

If you were to propose one new initiative that the federal government is not doing now what would it be?

The coronavirus pandemic has laid bare longstanding structural inequities that disproportionately harm historically marginalized communities, and in particular Black, Latino, Native, LGBTQ, and disability communities. As such, it is essential that the federal government adopt a lens emphasizing racial justice and social equity when addressing homelessness. In order to address the root causes of homelessness, federal resources should be specifically targeted to communities facing longstanding systemic disparities. Moreover, these resources should advance evidence-based approaches to ending homelessness, like [Housing First](#), rather than promoting high-barrier shelter and housing.

Outside of prior USICH federal strategic plan focuses, what else might the federal government do to prevent and/or reduce homelessness?

The severe shortage of affordable homes for the lowest-income people is the root cause of homelessness. According to NLIHC's yearly report [The Gap: A Shortage of Affordable Homes](#), there is a national shortage of 7 million rental homes affordable and available to America's 11 million lowest-income households. Despite the clear need, [three out of every four](#) households eligible for rental assistance do not receive it due to chronic underfunding. The federal government has a unique role to play in addressing homelessness by investing in housing affordable to people with the lowest incomes at the scale necessary.

As previously mentioned, the federal government must adopt a [Housing First](#) approach to prevent, reduce, and end homelessness. Housing First is a proven model for addressing homelessness that prioritizes access to permanent, stable housing as a prerequisite for effective psychiatric and substance abuse treatment and for improving quality of life. Once stably housed, individuals are better able to utilize wrap-around services that help support housing stability and recovery.

The federal government must also rescind the harmful and discriminatory rules that would eliminate protections for marginalized people and increase homelessness. HUD's proposed "mixed-status immigrant" rule would force families to either split up or face eviction. By HUD's own estimate, the agency's "mixed-status immigrant" rule would force 100,000 people, including 55,000 US-citizen children, to break up or face eviction and, in worst cases, homelessness. The administration should also rescind proposed changes to the Equal Access Rule that would allow discrimination against transgender people seeking access to HUD-funded shelters and services. Transgender people, and particularly transgender women of color, face an elevated risk of homelessness and violence.

What is one activity the federal government is doing that you believe should be deprioritized?

USICH's shift in focus away from evidence-based Housing First policies and toward failed behavioral modification programs ignores the [structural issues](#) that cause homelessness: the severe shortage of housing affordable to people with the lowest incomes. The Administration has also signaled its intent to return to ineffective, inhumane and expensive ways of "addressing" homelessness, such as using law enforcement to force people experiencing unsheltered homelessness into high-barrier housing or requiring them to sleep in "outdoor shelters" before being eligible for permanent housing. USICH Director Robert Marbut has attempted to justify this indefensible shift by touting [misleading and unfounded "data."](#) USICH should immediately stop its misguided focus on failed policies, and instead prioritize evidence-based solutions to homelessness, including Housing First.

However, rather than taking any action towards ending homelessness, the Trump Administration has proven time and again that it either fundamentally does not understand the causes and solutions to homelessness, or willfully chooses to ignore them to further harm marginalized communities. President Trump and his administration have [repeatedly proposed slashing funding](#) for HUD programs, [attempted](#) to triple rents for the lowest-income renters, and pushed harmful regulatory actions that would result in more people experiencing homelessness.

What is one activity that the federal government is doing well and that should be prioritized?

Ending homelessness necessitates addressing the [root causes](#) of homelessness – namely, the severe shortage of affordable, accessible, and available homes for the lowest-income people. To end homelessness, the federal government should protect and expand investments in proven solutions, like the national Housing Trust Fund and Housing Choice Vouchers, among other housing programs. Instead, this administration has proposed to slash federal investments in housing for each of the last four years – a proposal Congress has soundly rejected.

Overall, what would you say the top 3 federal priorities should be as they relate to preventing and ending homelessness?

In order to end homelessness, the federal government must invest in proven solutions at the scale necessary to make housing affordable to the lowest-income people. The federal government should call for a major expansion of the national Housing Trust Fund to build and

preserve homes affordable to extremely low-income households. It should address the gap between wages and housing costs by expanding Housing Choice Vouchers and/or creating a targeted renters' tax credit. An emergency rental assistance program can help keep families experiencing a temporary financial shock from falling behind on rent and facing eviction or homelessness. Finally, the federal government should enact a broad array of renter protections, including federal legislation to ban housing discrimination on the basis of source of income, gender identity, and sexual orientation, and increased enforcement fair housing laws.

In terms of homelessness, what areas are in need of greater attention at the federal, state, and local levels?

USICH's role in coordinating a holistic response to homelessness across government sectors places it in the unique position to break-down silos that typically stymie an effective, coordinated response to homelessness. However, this coordination would only be effective if resources are targeted to those with greatest need and policies are supported by evidence-based practices, such as Housing First.

Please feel free to contact Sarah Saadian, NLIHC Vice President of Policy, at ssaadian@nlihc.org for further information.