

July 11, 2020

Director Robert Marbut
US Interagency Council on Homelessness
301 7th Street, SW, Room 2080
Washington DC, 20407

RE: Comments on USICH's federal strategic plan to prevent and end homelessness

These comments are submitted on behalf of a coalition of national organizations (the Coalition) focused on homelessness, affordable housing and housing justice. The comments included in this submission reflect the common priorities articulated in a survey of member organizations and through group discussion. Individual organizations may submit separate comments that reflect their specific mission and priorities.*

Introductory Notes:

Given our collective experience with previous processes to gather input for *Opening Doors* and *Home, Together*, the Coalition finds that this process lacks transparency and authentic engagement, which is inadequate given the importance of a plan of this nature. We would welcome a more fulsome discussion of USICH's plan with a larger group of experienced homelessness and housing advocates to allow for a clearer understanding of the research and data being used to inform the plan as well as the metrics to be used to track the plan's progress.

Additionally, this survey ignores a glaring issue: The Administration has continued to propose policy changes that would increase homelessness and negatively impact the lives of vulnerable people. It has proposed slashing federal investments in housing, tripling rents on the lowest-income households living in HUD housing, forcing 100,000 mixed-status immigrant families to separate or face eviction, allowing publicly funded shelters to deny assistance to individuals based on their gender identity, and discouraging eligible immigrants from accessing housing programs.

Q1. If you were to propose one new initiative that the federal government is not doing now what would it be?

The Coalition recommends that USICH develop and implement a racial justice and equity (inclusive of gender, ability, etc.) initiative that cuts across all member federal agencies and dedicated funding streams. This initiative should focus specifically on populations facing disparities in homelessness with the intent of addressing inequities that are a root cause of homelessness. We recommend a focus on populations such as LGBTQ (especially transgender) youth and young adults, people of color, and people with disabilities. Initiatives focused on people of color most impacted by homelessness should specifically address Black, Latinx, and American Indian/Alaska Native homelessness through [evidence-based approaches like Housing First](#) and inclusive decision-making practices, rather than high-barrier housing.

Q2. Outside of prior USICH federal strategic plan focuses, what else might the federal government do to prevent and/or reduce homelessness?

The federal government should require its partners and recipients (communities, technical assistance providers, evaluators, etc.) to implement a racial justice and equity approach in their work to prevent and end homelessness, and should model these practices at the national level. Using this approach, the Coalition recommends that the federal government:

- Focus on areas with high unsheltered homelessness to support the development of affordable and permanent supportive housing through the use of dedicated and non-dedicated funding streams. These housing resources should be coupled with mainstream services to address the service needs of participants through a Housing First approach.
- Decriminalize homelessness and redirect law enforcement funding to services paired with housing to end practices that criminalize people for conducting essential daily living activities in public spaces in the absence of adequate alternatives.
- Increase employment, training, and education opportunities for people experiencing homelessness via evidence-based models (such as Individual Placement and Support), aimed at ensuring that jobseekers experiencing homelessness can obtain quality jobs that pay family-sustaining wages.
- Oppose work requirements, time limits, and other barriers for people being served in homelessness systems.
- Increase accountability for reductions in homelessness, using real time data to inform policy decisions.
- Ensure adequate housing resources to permanently house all people served in non-congregate and congregate shelters temporarily implemented during the COVID-19 pandemic.
- Provide guidance to communities on the development of non-congregate and safer shelter options, using lessons learned from the COVID-19 pandemic regarding the inherent danger of high-volume congregate shelter models.

Q3. What is one activity the federal government is doing that you believe should be deprioritized?

USICH should immediately de-prioritize its recent work to mislead the public and undermine [evidence-based approaches](#) to ending homelessness, including Housing First.

- USICH leadership has publicly indicated intentions to return to expensive and ineffective solutions to homelessness such as high-barrier transitional housing, and inhumane practices such as requiring vulnerable people to sleep in outdoor “shelter” before being eligible for permanent housing and using law enforcement to force unsheltered persons homelessness into programs they do not want.
- Advocates in the field have voiced concern around the use of [misleading claims and “data”](#) to support these approaches that fail to recognize the [causes of homelessness](#).
- USICH should commit to using its data resources in an ethical and honest manner.

Q4. What is one activity that the federal government is doing well and that should be prioritized?

Replication of the successful Youth Homelessness Demonstration Program (YHDP) should continue. In particular, the federal government should continue and expand YHDP’s robust and authentic

collaboration with people with lived expertise. Communities should be required to use this model for other populations and decisions, so that people with lived expertise are fully engaged leaders and partners in this work.

Q5. Overall, what would you say the top 3 federal priorities should be as they relate to preventing and ending homelessness?

The top 3 priorities for USICH should be:

1. Implementation of racial justice and equity approach;
2. Support and implementation of evidence-based interventions, including permanent supportive housing and deeply affordable housing through a [Housing First approach](#), and
3. Support for meaningful participation of people with lived expertise, including shared power in decision making and better understanding of sub-populations' experience of homelessness.

Q6. In terms of homelessness, what areas are in need of greater attention at the federal, state, and local levels?

The Coalition recommends that USICH use its convening authority more strategically to address issues that lead to homelessness for people involved in the Criminal Legal, Behavioral Health, and Child Welfare systems. USICH's position as the coordinator across federal agencies provides a unique opportunity to develop policy and program mechanisms that could break down existing silos, identify and fill gaps between systems that lead to homelessness, and decrease inflow into homelessness by better equipping communities to address difficult discharge planning and affordable housing issues.

Q7. Anything else you wish to add?

A Housing First approach, through which people experiencing homelessness are connected to permanent housing without prerequisites or other barriers, must remain a focal point within the strategic plan. Decades of research tells us the solution to homelessness is access to low-barrier, affordable homes. Any removal of this as the basis for the plan is in direct conflict with what advocates know works and what people experiencing homelessness want. *Home, Together*, included this priority and was approved in 2018 by the current Administration, and we therefore expect the upcoming revisions to the plan to again be rooted in Housing First as a core principle.

*** Members Include:**

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| A Way Home America | National Law Center on Homelessness & Poverty |
| Center on Budget and Policy Priorities | National Low Income Housing Coalition |
| Community Solutions | National Coalition for Homeless Veterans |
| CSH | True Colors United |
| Funders Together to End Homelessness | Youth Collaboratory |
| Heartland Alliance | |
| National Innovation Service | |