

COMMUNITY SOLUTIONS

July 10, 2020

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

RE: Comments on revisions to the federal strategic plan to prevent and end homelessness

Dear Director Marbut,

Community Solutions is a national nonprofit working to end to homelessness that leaves no one behind. We are writing to share our recommendations as you revise the federal strategic plan to prevent and end homelessness.

Our primary initiative is **Built for Zero**, a movement of more than 80 cities and counties using data to change how they work and to prove that it is possible to make homelessness rare and brief. Using a rigorous, data-driven approach:

- 12 communities have reached functional zero for veteran or chronic homelessness,
- 48 communities have achieved a measurable reduction, and
- 75 communities have achieved quality real-time data.

Based on our work with these communities across the country, we have observed the core changes that could facilitate and accelerate efforts to measurably reduce and end homelessness across the country. As you work to revise the federal plan to end homelessness, we respectfully ask that you consider the following:

EMBED EQUITY AND HOUSING FIRST VALUES

Creating a lasting end to homelessness will require placing equity and Housing First at the core of the federal government's plan.

Black Americans make up 13% of the population, but represent 40% of people experiencing homelessness. Any meaningful response to homelessness must address racism as a fundamental root cause. The federal plan must support and create accountability for racially equitable outcomes, and reflect a commitment to racial equity throughout all areas of work.

Additionally, we also know that LGBTQ youth and transgender adults are over-represented in our homeless populations. In order to effectively serve this community, the Equal Access Rule should be maintained, allowing transgender people to access the gender-specific shelter of their choice.

Housing First is one of the cheapest, most-effective, and proven solutions to homelessness. It ends homelessness, saves taxpayers money, and has driven reductions in homelessness. The federal government should maintain the Housing First model to ensure all barriers are removed for people who need to access housing, shelter, and services for the good of public health.

CREATE ACCOUNTABILITY FOR MEASURABLE, POPULATION-LEVEL REDUCTIONS

Communities need to be held accountable for population-level reductions.

Ending homelessness requires a data-driven system built upon a community-wide commitment to bringing every person home. In order to do this, the federal government should:

- Require communities submit systems-level data, not program-level data, as evidence individual programs are working.
- Include allowances for flexible funding. Allow programs the flexibility to cover emerging needs so people do not languish in the homelessness system unnecessarily and are moved in homes more quickly.

The federal government should adopt the Built for Zero definition of “Functional Zero” as the gold standard.

Built for Zero's definition of functional zero is a straightforward standard that allows a community to measure cleanly, objectively, and in real time, whether it has ended veteran or chronic homelessness and also whether it is sustaining this outcome over time.

- This definition is widely-socialized, objective, and quickly measurable.
- Communities that have reached this measurement have a greater track record of reducing homelessness in the long-run than other definitions of zero.

FOCUS ON REAL-TIME DATA and DATA COLLECTION

The federal government should invest in collecting comprehensive, real-time, by-name data. Through Built for Zero, more than 70 communities now have real-time, by-name accounting of everyone experiencing homelessness. This level of data quality is transformative. The federal government should leverage this advancement and put the clunky apparatus of Point in Time (PiT) counts behind us.

To achieve collecting real-time data, we also recommend the federal government:

- Build in race, sexual identity, gender identity, and other key equity data points.

- Refocus funding from PiT to systems infrastructure (Coordinated Entry) so that data managed through the CES system is the measurement infrastructure for reductions and tracking to an end to homelessness.
- Reward communities for reductions in homelessness and define high-performing communities by their reduction of actively homeless numbers.

Homeless Management Information System (HMIS) should enable community-wide performance accountability and the use of data should drive both effective case management and system-wide improvement toward the goal of zero.

When addressing changes to the HMIS system, we also recommend the federal government:

- Anticipate real-time data collection and usability in HMIS redesign statute.
- Open the market to meaningful competition.
- Overhaul the statute to address modern community data collection and use needs.
- Embed a real-time, population-level, equity-centered analytics approach.
- Build meaningful, objective, population-level endstate definitions into the platform.
- Ensure easy, consent-based, client-level data sharing between public agencies, especially between the homeless system, health care sector, and public health system.
- Ensure a data-sharing firewall between social service and security/law enforcement agencies.

OTHER KEY AREAS

Other key areas that need to be addressed are the Grant per Diem program (GDP). The federal government should eliminate this high-risk, congregate model for all but bridge beds and those requiring or requesting treatment.

A focus on increasing housing stock and reducing barriers to affordable housing will also help prevent and divert people from homelessness. In addition, the federal government should institute policies and fund programs that focus on prevention, like funding accountability structures around inflow into homelessness that are connected to Continuum of Care (CoC) programs and funding shallow rent subsidies to help families who need a little assistance to stay in their homes.

Last, strong federal agency coordination is imperative to ending homelessness. We call on the federal government to strengthen the collaboration between the agencies within the US Department of Housing and Urban Development, and with other federal agencies such as the Veteran's Administration, Health and Human Services Department, and the Centers for Disease Control and Prevention. Only by working together can we finally end homelessness across the US.

We look forward to continuing to partner with the USICH to create a lasting end to homelessness that leaves no one behind. Thank you for considering our comments and recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Rosanne Haggerty". The signature is fluid and cursive, with a prominent loop at the end.

Rosanne Haggerty
President
Community Solutions

CC: Department of Housing and Urban Development
Department of Veterans' Affairs
Senate Committee on Banking, Housing & Urban Affairs
Senate Committee On Veterans' Affairs.
House Committee on Financial Services
House Committee On Veterans' Affairs