

2021 Reconciliation Proposals

Community Solutions, 9-15-2021

Service Improvement Managers

Ask: \$120,000,000/year for three years (FY 2023-25) through HUD to fund new system improvement managers (SIMs) in CoCs.

Communities need dedicated and experienced data, process and systems improvement leaders whose primary responsibility is accountability for meeting Systems Performance Measures (SPMs) and Longitudinal Systems Analyses (LSAs). The SIMs would be empowered to use real time data to drive outcomes and population reductions in homelessness. Unlike other staff whose primary role is supporting programmatic, compliance, or organization-specific goals, these individuals will be uniquely responsible for coordinating system-wide efforts to achieve reductions in homelessness across the entire CoC.

Because CoCs are often hindered in their ability to achieve system-wide reductions in homelessness, at least one SIM per CoC will provide this vitally needed support for achieving success in SPMs and LSAs. The SIMs would also be charged with optimizing new federal and other funding coming into the community (emergency assistance, disaster relief, support services resources, etc.) that could improve SPM and LSA measurements to drive permanent reductions in homelessness. They would take the lead in collecting and disseminating critical, real time data to demonstrate how specific interventions, policies or investments are contributing to population-level reductions in homelessness and to enable continuous improvement of local CoCs outcomes.

Right now, CoCs are evaluated by SPMs but may not have anyone directly accountable for these metrics. The SIMs would be responsible for meeting the SPMs, and their performance would be evaluated against the CoCs SPMs and population-level homelessness reduction goals.

Many CoCs struggle to attract talent with the skills and experience needed to improve system-wide CoC outcomes, apply data analytics as a system improvement tool and coordinate the complex functions of local homelessness response systems to achieve population-level aims. Recognizing this challenge and the private market competition for such roles, a baseline allocation of an average of \$150,000 per year for one SIM would be

available per CoC. Any additional allocation would be dependent on the availability of funds and demonstrated need.

This allocation shall be exempt from any statutory limits on funding, including caps on the funding of administrative costs or any planning activities as defined by 24 CFR § 578.39, and shall not count toward any cap on such activities under 42 USC 11383(a)(10) or (a)(11):

(10) In the case of a collaborative applicant that is a legal entity, payment of administrative costs related to meeting the requirements described in paragraphs (1) and (2) of section 402(f), for which the collaborative applicant may use not more than 3 percent of the total funds made available in the geographic area under this subtitle for such costs.

(11) In the case of a collaborative applicant that is a unified funding agency under section 402(g), payment of administrative costs related to meeting the requirements of that section, for which the unified funding agency may use not more than 3 percent of the total funds made available in the geographic area under this subtitle for such costs, in addition to funds used under paragraph (10).

Rural CoC capacity building

Ask: \$35,000,000/year for three years to fund dedicated FTEs responsible for outreach and service delivery to rural communities and in tribal areas that participate in the CoC program.

Rural homelessness and homelessness in tribal communities doesn't usually look like homelessness experienced in metropolitan areas. Homelessness in these communities is often out of sight, and a recognition or definitional gap can exist between the person experiencing homelessness and the service provider. And due to the geographic make up of many CoCs, those in charge of reaching people experiencing homelessness in rural and tribal areas are often responsible for large geographies—sometimes thousands of square miles—as part of a balance of state CoC, or their time and capacity is taken up by the more urban location(s) within their regional CoC.

Dedicated staffing capacity is needed to target those experiencing homelessness in the most rural areas. \$35,000,000 per year would fund over 460 FTEs at \$75,000 annually specifically targeted to rural and tribal communities, or roughly one FTE for every four rural counties with additional capacity for tribal lands as they join or participate in the CoC program. Each FTE hired under this funding would be required to devote 70% of their time towards outreach and service delivery in a rural or county or counties, as defined by HUD or

the USDA Rural Development Program, or in tribal areas, with the goal of ending homelessness as it is experienced in these communities among the most vulnerable, hard to reach resident that are not always well-served by current CoC structure and capacity. These FTEs would also be charged with maximizing service delivery within the rural counties or tribal areas rather than centering services around the most metropolitan communities within the CoC, and to identify, document, and provide outreach to those experiencing rural homelessness whose conditions may not align with our current vocabulary grown out of urban homelessness. This is also true in tribal areas. FTEs shall conduct stakeholder outreach within their dedicated communities to engage local institutions, including the integration of any new or one-time resources made available through this act, the American Rescue Plan, the CARES Act, or any future funding. FTEs shall coordinate these outreach and delivery activities with USDA Rural Development.

Tribes or Tribal Designated Housing Entities (TDHEs) who elect to participate in the CoC program or who partner with the Collaborative Applicant of an adjacent CoC would also be eligible for this funding to provide outreach and support on tribal lands. Funding for Tribes and TDHEs who do not participate in the CoC program or partner with a local CoC could be made available through Indian Housing Block Grants.

This funding shall be administered as part of the CoC Program Competition. This funding shall be in addition to, not in lieu of, any other funding allocated to the CoC Program Competition. This funding shall only be available for the purpose of funding FTE capacity in CoCs in areas that are or include rural or tribal communities. Any funding remaining at the end of the three years shall be reallocated the following year(s) for the same purpose.

The use of the proposed funding for its intended purpose shall be considered a continuation of outreach services and shall not be considered a new project for the purposes of CoC application scoring.

GPD permanent housing grant program

Ask: \$50 million in competitive grant funding available through the VA Homeless Providers Grant and Per Diem (GPD) program to current GPD grantees to fund the conversion of transitional housing to permanent housing.

With the end goal of helping even more veterans exit homelessness and achieve housing stability, resources to enable the conversion of GPD facilities into permanent affordable and supportive housing will expand the supply of housing for veterans. This \$50 million ask is in line with the current capital grant program which funds the conversion of congregate shelters to single occupancy transitional housing at \$50,000 per unit.

Grant amounts will be based on the number of proposed permanent housing units and the type of conversion proposed (single bed or congregate shelter to efficiency, studio, multi-room apartment, or SRO). Funding will be prioritized based on demonstrated need and other local factors including available VASH, to be determined by the VA. Acquisition and/or construction costs will also be an eligible use based on demonstrated community need, including infeasibility or inefficiency of converting existing GPD facilities. GPD providers may also request an additional five percent of the conversion grant amount in order to secure technical assistance and capacity building support for the creation and operation of permanent housing.

Any permanent housing created as a result of this program by a grantee shall not be considered an end or diminution of grant-funded GPD services and, pursuant to 38 USC § 2013(c) (below), any grantee who participates in this program shall not be considered noncompliant with any grants promulgated pursuant to 38 USC § 2011 due to the conversion of any grant-funding housing from transitional to permanent.

In any case in which a facility, with respect to which a person received a grant for construction, rehabilitation, or acquisition under section 2011 of this title, is converted as described in subparagraph (B)(ii), such conversion shall be considered to have been carried out pursuant to the needs of the Department and such person shall not be considered in noncompliance with the terms of such grant by reason of such conversion.