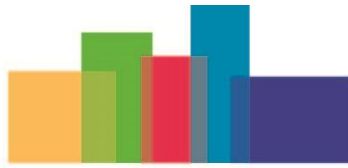


# Ending Homelessness through the Continuum of Housing: A Policy Brief



CNHED

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# The Continuum of Housing and Ending Homelessness

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In July 2010, the Coalition for Nonprofit Housing and Economic Development (CNHED) issued its report: *An Affordable Continuum of Housing . . . Key to a Better City*. The report highlighted the need in the District of Columbia for an affordable Continuum of Housing to provide a range of options with a place for everyone based on how much they can afford to spend on housing and the services they need. The report described the Continuum of Housing as including emergency shelter for the homeless, supportive housing for people with special needs, rental housing that fills the gap between what people can afford to pay and the high cost of rent, and helping families buy their first home or tenants to buy their apartment building. The report also recognized that along with a range of housing options, there is also the need for a variety of services to build community and support residents, including those who have been recently homeless, the elderly, families with children, and persons with special needs. This report also formed the initial platform of CNHED’s remarkably successful Housing For All Campaign.<sup>1</sup>

The Housing For All Campaign significantly changed the housing landscape in Washington, DC, winning a change in political will and significant funding investments in affordable housing. Most notably, the Campaign was able to secure a \$100 million baseline annual commitment; and in fiscal years 2016 and 2017, Mayor Muriel Bowser and the Council of the District of Columbia followed through on that commitment. In addition, DC’s locally-funded voucher program received more than \$26 million, and the Campaign helped build momentum for DC to end chronic homelessness. A critical part of the strategy was the adoption of the District of Columbia Interagency Council on Homelessness’ *Homeward DC*<sup>2</sup> plan to end chronic homelessness by 2020. This policy brief considers the *Homeward DC* plan in the context of the Continuum of Housing in order to delve more deeply into specific recommendations regarding practices and policies to end homelessness, and the funding to support them.

CNHED supports the *Homeward DC* plan’s goal of making homelessness a “rare, brief, and nonrecurring experience” by 2020. CNHED also advocates that the District maintain broad support for a Continuum of Housing for all residents, with a focus on the most vulnerable. CNHED supports Housing First, as well as other evidence-based models that demonstrate successful outcomes for their residents. CNHED believes there should be a diversity of housing choices in the homelessness prevention system, including transitional housing for special populations and recovery housing for those who choose this option.<sup>3</sup> This diversity is needed to respond to consumer needs and wants. In order to prevent displacement and to ensure that residents in Rapid Rehousing, transitional, and recovery housing can move to permanent housing, the District should continue to use local dollars to preserve and produce long-term affordable housing for extremely-low- to moderate-income residents.

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<sup>1</sup> For more on the Housing For All Campaign, please visit <http://h4all.cnhed.org/>

<sup>2</sup> DC ICH, 2015

<sup>3</sup> Special populations include, but are not limited to, domestic violence survivors, youth, and returning citizens, who may want a structured, supportive, and communal environment.

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## Process

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During April and May 2016, CNHED convened members and allied organizations who are active in providing housing for persons who are currently experiencing homelessness, at risk of homelessness, and/or formerly experienced homelessness. The goal of these meetings was to decide how to advocate for housing and services for District residents exiting homelessness within the context of CNHED's *An Affordable Continuum of Housing . . . Key to a Better City* (2010). Through these discussions, the group clarified CNHED's messaging and positions related to all categories of transitional and supportive housing, defined key advocacy issues with respect to this area of the Continuum of Housing, and identified related implementation issues. This document represents perspectives developed from those conversations, interviews with and feedback from a larger group of practitioners, and the deliberations of CNHED's Supportive Housing Working Group and Housing Committee.

All technical terms in this document are used as defined by the *Homeward DC* plan, the US Interagency Council on Homelessness (USICH), and the US Department of Housing and Urban Development (HUD). A glossary is available at the end.

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## Position Statements and Action Steps

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CNHED believes that an ample supply and array of solutions is needed to end chronic homelessness and to sustain a continuum of housing that meets the needs of the most economically vulnerable residents of the District. CNHED supports shifting policy priorities from emergency shelter to the housing solutions discussed below.

### Permanent Supportive Housing

CNHED supports the use of Permanent Supportive Housing (PSH) programs that comply with the Housing First and other evidence-based models (e.g. Recovery Housing) for chronically homeless individuals. The *Homeward DC* plan notes that “HUD defines PSH as permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.”<sup>4</sup> According to HUD, “Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.”<sup>5</sup> Further, HUD specifies that in a Housing First approach “supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.”<sup>6</sup> PSH in a Housing First model means that there will be few to no barriers to entry; a streamlined entry process; voluntary, supportive services; and full tenant rights.<sup>7</sup>

PSH can be offered in a scattered site model where tenants receive rental assistance, single site models, where the entire building is dedicated to PSH, or set-asides, whereby certain units are designated for PSH tenants. PSH housing may result from the production of new housing stock, or through leasing of existing units.

#### *CNHED supports*

- Fully funding PSH to the levels needed to meet the goals of ending chronic homelessness identified in the *Homeward DC* plan.
- Funding for organizations that choose to convert their transitional housing to TAH or PSH. Some operating or capital subsidies may be needed, depending on the configuration of the transitional housing and the funding stream.

#### *Possible action steps*

- Improve coordination among housing providers and PSH service providers in order to ensure coordination around resident services and that the housing provider’s resident services staff are not dealing with issues that are beyond their capacity or level of expertise.
- Provide capacity building and education to help developers and PSH service providers link up and coordinate successful partnerships (e.g. CNHED-CSH capacity building proposal to DCICH/DHCD).

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<sup>4</sup> DC ICH 2015, 53.

<sup>5</sup> HUD 2014, 1.

<sup>6</sup> HUD 2014, 1.

<sup>7</sup> HUD 2015, 7.

- Support organizations in evaluating the outcomes of their services.
- Evaluate the cause of delays in the PSH lease-up and advocate for improvements.
- Support accountability in reaching the *Homeward DC* goals through advocacy.
- Explore how transitional housing programs can convert to permanent housing. In order to do this, providers will have to look at the housing stock, including the configuration of units, in order to most effectively use their resources.

## Transitional housing

Transitional housing is defined by HUD as a housing accommodation designed to “facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary.”<sup>8</sup> These programs provide structured supportive services, including case management. Transitional housing is an important component of the continuum of housing when it is targeted to special populations where a common condition or circumstance makes a particular form of services support desired and effective. Transitional housing with proven outcomes, including exit plans for residents, should continue to receive funding.

### *CNHED supports*

- Transitional housing as a consumer option, particularly for special populations.
- The use of local dollars for non-Housing First programs that have strong outcomes and are part of consumer choice.
- Sufficient funding to sustain high performing programs so long as there is a demand for them.

### *Possible action steps*

- Define a coordinated exit strategy through which residents can successfully move from transitional housing into PSH, TAH, and other affordable housing.
- Advocate that local funding be made available specifically to ensure successful transitions for lower-income residents from transitional housing to permanent housing.
- Support organizations in evaluating their programs’ outcomes. This evaluation should include cost-effectiveness, the amount of time it takes people to transition from the program, and what happens to residents exiting the programs. Developing such an evaluation could be a small working group project.
- Ensure technical assistance is provided, as needed, to support providers in updating their models.
- Explore how assistance can be provided to smaller organizations, with successful programs, to coordinate Medicaid billing so that they can continue their programs.
- Participate in conversations around coordinated entry. As part of these conversations, CNHED should explore how transitional housing programs could accept people through coordinated entry, given that the programs are likely serving special populations and may have unique requirements.

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<sup>8</sup> DC ICH 2015, 54.

## Recovery housing

Recovery housing is defined by HUD as “housing in an abstinence-focused and peer-supported community for people recovering from substance use issues.”<sup>9</sup> CNHED believes that there is a place for recovery housing within the District’s continuum of housing. The amount of recovery housing should be based on ongoing monitoring of consumer preference, where there are choices between different housing models. CNHED agrees with HUD that recovery housing should be minimal barrier, established on evidence-based practices and models, and allow for consumer choice.<sup>10</sup> HUD acknowledges that recovery housing can take place in either a transitional housing or a supportive housing context where there is no time limit on occupancy. CNHED agrees with HUD that participants in recovery housing should have all legal tenancy protections relevant to their particular program category (permanent supportive or transitional housing) and jurisdiction.<sup>11</sup> As part of consumer choice, these programs should allow for transitions to other affordable housing, including other supportive housing. Recovery housing programs should have exit plans to ensure that residents are able to move on from recovery housing.

### *CNHED supports*

- Recovery housing as an option for consumers within the homelessness services system.
- The use of local funds for non-Housing First programs that have strong outcomes and are part of consumer choice.
- Funding decisions based on the need and want for recovery housing, evidence of a particular program’s outcomes, and how people transition from the program.

### *Possible action steps*

- Define what a coordinated exit strategy would look like whereby residents can successfully transition from recovery housing.
- Advocate that local funding be made available specifically to ensure successful transitions for lower-income residents from recovery housing to permanent housing.
- Propose to DCICH that a definition be created for recovery housing or suggest a definition. This definition should include a definition of success (time and outcome). When a consumer decides that recovery housing is not the right model for them, that person should not return to homelessness.
- Support organizations in evaluating the outcomes of their programs. This evaluation should include cost-effectiveness, the amount of time it takes people to transition from the program, and what happens to residents exiting the programs. Developing such an evaluation could be a small working group project.

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<sup>9</sup> HUD 2015, 1.

<sup>10</sup> HUD 2015, 3. HUD states that there should be “minimal barriers to entry into programs, so that long periods of sobriety, income requirements, clean criminal records, or clear eviction histories are not required for program entry.” *Ibid.*, 5.

<sup>11</sup> Regarding permanent supportive housing, HUD states that “participants have a lease and must operate in full compliance with local landlord tenant laws, including governing eviction processes.” *Ibid.*, 7. In the case of transitional housing, HUD states that “participants could have a lease, but must at least have an occupancy agreement.” *Ibid.*, 6. In the District of Columbia, the only exceptions to full tenancy protections are housing providers that petition the Rent Administrator for an exemption under DC Code § 42–3502(e)(4). Regulations regarding petitioning the Rent Administrator for this exemption are contained in DC Municipal Regulations Title 14: Housing, Chapter 14-41, Rule 14-4105. Housing providers who obtain this exemption from the Rent Administrator must notify their tenants pursuant to § 42-3502.22 (b)(E).

- Ensure that support is provided to housing providers to update their models, as needed, as best practices for recovery housing evolve.

### Targeted Affordable Housing

Targeted Affordable Housing (TAH) refers to “units or subsidies that offer long-term affordability and are dedicated for use by the homeless services system.”<sup>12</sup> TAH serves those needing a long-term subsidy in order to avoid homelessness but who do not require ongoing supportive services or only require less intensive services. It may be used as a step-down strategy from PSH or a step-up strategy from RRH. TAH continues to evolve, and full definition and protocols continue to be developed by the DCICH.

#### *CNHED supports*

- Fully funding TAH each year to the levels needed to meet the goals of ending chronic homelessness identified in the *Homeward DC* plan.
- A mix of TAH options, including leased, produced, and units designated in affordable housing projects. This mix is necessary to provide people with choices in where they live.
- The possibility for residents to transition back into PSH, when necessary.
- Funding for organizations that choose to convert their transitional housing to TAH or PSH. Some operating or capital subsidies may be needed, depending on the configuration of the transitional housing and the funding stream.

#### *Possible action*

- Comment on DCICH’s TAH protocol.
- Participate in the creation of rent guidance for TAH and work to understand how much additional HPTF, LRSP, and other funds will be required to create these units.
- Participate in defining the income levels and services needed with the understanding that although TAH assumes an ongoing subsidy, this could be LIHTC, or another affordable housing program, rather than an ongoing rent subsidy.
  - Explore how transitional housing programs can convert to permanent housing. In order to do this, providers will have to look at the housing stock, including the configuration of units, in order to most effectively use their resources.

### Rapid Rehousing

Rapid Rehousing (RRH) “provides supportive services and/or time-limited financial assistance to help a household quickly secure housing, including move-in assistance, short- or medium-term rental assistance, and supports to address barriers to long-term housing stability including connections to employment.”<sup>13</sup>

#### *CNHED supports*

- RRH as an important part of the continuum of housing for people exiting homelessness.

#### *Possible action steps*

- Make suggestions regarding how to define successful implementation of RRH.

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<sup>12</sup> DC ICH 2015, 53.

<sup>13</sup> USICH 2015, 20.



- Continue to clarify and define both the time limits for rent subsidy and the efficiency in exiting to PSH or TAH as may be indicated.
- Support funding for capacity building to enable successful implementation.
- Explore options to support lower-income residents to compete in the marketplace after RRH support ends.
- Explore ways to encourage for- and nonprofit property owners to participate in RRH.
- Encourage the DCICH to monitor coordinated entry and placement of tenants assigned to RRH to gauge ongoing appropriateness of placement decisions.

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# Implementation Issues

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## Funding Issues

CNHED members recommend that the CNHED Supportive Housing Working Group explore advocating for the following recommendations:

- Agencies should improve interagency coordination:
  - Ensure coordination between agencies by including capital, subsidy, and service dollars in one Notice of Funding Availability (NOFA).
  - Explore whether or not additional agencies, including the Departments of Health and Disability Services, should be added to the consolidated NOFA.
  - Create a model for how services and operating subsidies should work together in projects.
- Agencies should improve funding transparency and scoring issues in the NOFA:
  - Prioritize funding through transparent, public scoring preferences.
  - Provide points in the NOFA for the provision of resident services in non-Housing First housing.
- Department of Human Services (DHS) should improve funding processes:
  - Improve DHS capacity to administer funds more efficiently, effectively, and transparently.

## Service Delivery Issues

CNHED's Supportive Housing Working Group should explore working on the following overarching issues:

- Facilitate and participate in discussions to improve the process of and participation in coordinated entry.
  - Define working group positions and ideas.
    - Families and individuals should be accurately assessed upon entry into the system and funneled according to need/barrier. The shelter system should focus on housing and progressive engagement versus ongoing crisis management.
    - Scoring in the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) should include flexibility so that certain populations who obtain temporary housing and services do not find themselves at a disadvantage when seeking to enter permanent affordable housing.
  - Explore the possibility for recovery housing to participate in coordinated entry.
- Define and improve resident transitions from short-term programs (particularly transitional and recovery housing)
  - Create more seamless transitions and exit plans (coordinated exit).
- Facilitate the building of relationships among developers, landlords, and service providers
  - Develop educational programs to facilitate joint understanding of each industry's needs.
  - Promote understanding of tenants' needs and rights to ease the concerns of developers and landlords about tenant behaviors and to maximize effectiveness of supportive services staff in addressing developer concerns.
  - Provide guidance to supportive service providers on how to negotiate implementation and operating costs with developers.
  - Participate in joint efforts to ensure prevention of subsequent homelessness and decrease eviction.

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# Definitions

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**Chronically homeless:** person or the head of household, must have “a disability and have been living in a place not meant for human habitation, in an emergency shelter, or a safe haven for the last 12 months continuously *or* on at least four occasions in the last three years where those occasions cumulatively total at least 12 months” (HUD 2015, 1).

**Housing First:** “Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.” (HUD 2014, 1).

**Permanent Supportive Housing (PSH):** “HUD defines PSH as permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently” (DCICH 2015, 53)

**Rapid Rehousing (RRH):** Rapid Rehousing “provides supportive services and/or time-limited financial assistance to help a household quickly secure housing, including move-in assistance, short- or medium-term rental assistance, and supports to address barriers to long-term housing stability including connections to employment.” (USICH 2015, 20).

**Recovery Housing:** Recovery Housing is defined by HUD as “housing in an abstinence-focused and peer-supported community for people recovering from substance use issues” (HUD 2015, 1).

**Targeted Affordable Housing (TAH):** “Units or subsidies that offer long-term affordability and are dedicated for use by the homeless services system” (DCICH 2015, 53). TAH is targeted to those needing a long-term subsidy in order to avoid homelessness but who do not require ongoing supportive services or only require less intensive services. It may be used as a step-down strategy from PSH or a step-up strategy from RRH.

**Transitional Housing:** A housing accommodation designed to “facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary” (DCICH 2015, 54). These programs provide structured supportive services, including case management.

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