HEARTLAND ALLIANCE

U.S. Interagency Council on Homelessness
301 7th Street Southwest | Room 2080
Washington, DC 20407

RE: Feedback from Heartland Alliance on the U.S. Interagency Council on Homelessness' Revised Federal Strategic Plan to Prevent and End Homelessness

July 10, 2020

Thank you for the opportunity to provide feedback on the revised federal strategic plan to prevent and end homelessness. Heartland Alliance is a human rights and social service organization with policy, research, systems change, and programmatic expertise in ending poverty, including preventing and ending homelessness. Annually, we serve over 400,000 participants and impact over 5 million individuals through our policy and advocacy work. This feedback reflects input from experts across the Alliance who work daily to end poverty by advancing health and healing, safety and justice, and economic opportunity.

To truly prevent and end homelessness, USICH and its members must leverage their collective resources and expertise to address its root causes: policies, systems, and practices, grounded in institutional racism and sexism, that perpetuate poverty and inequity.

At Heartland Alliance, we know deep inequities drive homelessness and housing instability. Among other marginalized populations, Black people, women, and LGBTQ+ youth and adults—and especially those with intersectional identities—face inequitable access to safe and affordable housing; holistic healthcare; impactful education and training opportunities; quality jobs; and asset building tools. Black people bear the brunt of these inequities and are overrepresented among youth, adults, and families experiencing homelessness.

We strongly urge USICH to center equity and especially racial equity in its revised plan. All of the recommendations should be designed, implemented, and evaluated via an equity lens. We recognize that doing so will require federal, state, and local partners to commit new or redirected resources to their ongoing efforts to prevent and end homelessness. To ensure USICH's planning process and the revised plan support and advance equity, USICH should uphold the following foundational values:

1) Center the voices of impacted people:
The planning process must include authentic collaboration and decision-making with people with lived expertise of homelessness and housing instability. This includes compensating individuals for their time and expertise. A plan that does not center the voices of the people most impacted will miss crucial insights and perspectives, and it will inevitably fall short of meeting its goals.

2) Support and advance Housing First approaches:
The revised federal plan must uphold a commitment to Housing First approaches, which quickly connect people experiencing homelessness to permanent housing without prerequisites, and then provide them with the services and supports they want and need to stabilize in housing. Housing is a human right, and efforts to undermine Housing First approaches conflict with what on-the-ground experience and research demonstrate: that access to safe, healthy, affordable homes is key to ending homelessness. Moreover, housing readiness assessments are subject to racial bias. The determination of whether or not a person is "ready" for housing is subjective and therefore implicit racial bias among staff plays a role in deciding who is or isn't a "good" candidate for housing. Additionally, because of centuries of systemic racism, people of color—and Black people in particular—are disproportionately likely to face barriers to accessing housing such as chronic unemployment or having a criminal record. Any effort to deprioritize Housing First and instead assess people's housing "readiness" based on barriers they may face—or to impose eligibility requirements that make it hard to access or stay in housing or related programming—will result in disproportionately excluding people of color from housing and homeless services.

3) Use data and performance metrics to hold federal agencies and stakeholders accountable to equity goals:
To hold federal agencies and other stakeholders accountable for advancing equitable solutions to homelessness and housing instability, USICH should ensure that each of the plan's recommendations is tied to performance metrics that measure its progress in redressing racial and other inequities related to access to public systems, services and supports received, and outcomes. This will require all USICH agencies to address data or knowledge gaps to support communities in collecting, sharing, analyzing, and using data that is disaggregated by race, ethnicity, gender, and age, among other demographics.

Along with these foundational points, here are some specific recommendations to prevent and end homelessness that reflect the depth and breadth of our expertise:

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- Streamline the homelessness definition and ensure it is expansive and inclusive of people who are unstably housed (e.g., people living in hotels/motels, couch surfing, doubled up, etc.).
- Ensure each state has its own interagency council on homelessness that is supported by USICH.
- Establish and fully resource a national, dedicated, and flexible funding source for supportive services for people who live in federally subsidized rental properties such as those rented via public housing, project-based rental assistance, the Housing Choice Voucher Program, and Low-Income Housing Tax Credit properties.
- Reduce criminal legal system overreach on the lives of people experiencing homelessness, including by decriminalizing homelessness and eliminating all laws and policies that impede access to public and private housing for people who have been involved in the criminal legal system.
- Invest at scale in inclusive, accessible public housing. This includes fully funding the Public Housing Operating Fund and the Public Housing Capital Fund, for which there is a substantial backlog due to decades of neglect.
- Increase employment, training, and education opportunities for people experiencing homelessness via evidence-based models such as Individual Placement & Support, subsidized employment and transitional jobs, and employment social enterprises. These efforts should be aimed at ensuring that jobseekers can obtain quality jobs.
- Oppose work requirements, time limits, and other barriers that limit access to basic assistance programs.
- Promote safe, accessible asset building strategies for people experiencing homelessness and housing instability, including pathways to home ownership.
- Support cross-agency implementation of approaches that build pathways to economic opportunity among people experiencing homelessness and housing instability, such as: child savings accounts, basic income, jobs guarantees, subsidized employment programs, rent control, and robust cash transfers.

Our recommendation is that USICH create a revised federal plan that is designed, implemented, and evaluated via an equity lens. This requires leveraging resources as well as centering the voices of impacted people, advancing Housing First approaches, and using data and performance metrics to drive accountability toward equity goals.

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Thank you,

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