July 8, 2020

To: United States Interagency Council on Homelessness

Re: Public Input to Revise the Federal Strategic Plan to Prevent and End Homelessness

The San Diego Regional Task Force on the Homeless (RTFH) appreciates the opportunity to provide input to the United States Interagency Council on Homelessness (USICH) for revising the federal plan to prevent and end homelessness. As the lead agency for the San Diego Continuum of Care (CoC), the RTFH and community partners have used prior USICH federal plans including Opening Doors and Home Together to guide local goals, strategies, and actions for ending homelessness. The RTFH has adopted the vision of making homelessness rare, brief, and non-recurring, and to realize this vision has embraced the concept that ultimately housing ends homelessness and is working to operationalize the evidenced-based solution of a Housing First approach. The RTFH has reviewed the questions posed by the USICH and recommends the following be included in the revised USICH plan:

- **Increase affordable housing:** The most significant challenge for solving homelessness is the severe lack of affordable housing and the significant gap between wages and public assistance and the cost of housing. Increasing affordable housing needs to be a top focus of the approach for ending homelessness. Policy makers, researchers, and advocates have proposed various strategies such as a universal rent subsidy program for all low-income renters, a federal housing tax credit, streamlining development, and others. Regardless of the specific approach, increasing affordable housing needs to be a top priority for the USICH.

- **Continue to be a leader in advocating for evidenced-based solutions:** The USICH should continue to be a leader in advocating for evidenced-based solutions including a commitment to Housing First and supporting communities with implementation. The USICH needs to also continue to promote other promising and evolving practices for addressing homelessness such as housing problem solving or diversion, shared housing, shallow subsidies, and others. Lastly, the USICH should maintain content and history of evidenced-based practices on its website so as to be a national repository of content for addressing homelessness.

- **Continue commitment to current federal plan – Home Together:** The USICH has done a tremendous job with creating the current federal plan, Home Together, and should continue to focus on implementing the goals and strategies within the plan. Many of the evidenced-based and promising practices highlighted above are embedded in the current plan and should remain. Additionally, the USICH should continue to have its staff available and embedded in the regions they serve and work with a variety of stakeholders including CoC’s on promoting best practices. It is important and has been extremely beneficial to have USICH staff, especially Regional Coordinators, have a firm grasp on regional dynamics for setting federal priorities.

- **Include persons with lived experience:** The federal plan needs to promote the inclusion of persons with lived experience in all aspects of policy making, funding, and program design. The federal government should continue to support pilot initiatives such as the Youth Homelessness Demonstration Program (YHDP) that includes lived experience voices as a key component of the process and decision making.
• **Promote the equitable distribution of resources:** Ensuring an equitable distribution of resources to address housing and homelessness at federal, state, and local levels is critical. Resources should be distributed by need to ensure that all regions receive an equitable level to effectively address homelessness in a given geography. There is also a need for more flexibility with funding and allowing for local decision making on uses of funding to meet specific needs as long as strategies are aligned with best practices.

• **Address racial disparities and promote equity:** The USICH should continue to support a national movement to address racial disparities within the homeless population and work to promote racial equity across the homeless crisis response system.

• **Address unsheltered homelessness through compassionate person-centered and housing-focused services:** The USICH should place a focus on promoting an approach to addressing unsheltered homelessness that emphasizes a person-centered housing-focused approach rather than enforcement. The USICH should seek to work with communities to halt attempts to address unsheltered homelessness through enforcement and other activities that criminalize homelessness and make it harder for individuals to exit the streets or encampments.

• **Halt attempts to remove protections for marginalized populations:** The USICH and the federal government need to halt all attempts to remove protections for historically marginalized populations including LGBTQ and undocumented immigrants. Recent activities by HUD to roll back protections under the Equal Access Rule that ensured shelter and housing programs could not discriminate based on sexual orientation and gender identity need to be immediately stopped.

• **Align Housing and Services:** The USICH needs to work with federal departments to continue to support the alignment of housing and services and determine how healthcare funding such as Medicaid can increasingly be a part of funding the services in housing.

Again, the RTFH appreciates the opportunity to provide input to USICH on the federal plan and looks forward to continued partnership on ending homelessness in San Diego and across the country.

Sincerely,

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Tamera Kohler, CEO
San Diego Regional Task Force on the Homeless