



Texas Homeless Network Response to USICH Report, “Expanding the Toolbox: The Whole-of-Government Response to Homelessness”

October 23, 2020, Austin, TX -Earlier this week, the United States Interagency Council on Homelessness (USICH) held a roundtable discussion focused on the recently released report, "Expanding the Toolbox: The Whole-of-Government Response to Homelessness." As a statewide agency focused on ending homelessness in Texas, we feel it is imperative to give a public response to this recent development. Additionally, as an agency leading Texas communities to make homelessness rare, brief, and non-recurring, we must promote the statistically proven solutions and the strategies that most effectively and efficiently assist people to remain housed and escape homelessness.

The actions this report promotes do not include some widely used and successful best practices and even attack one of those that are most effective, Housing First. Additionally, on page one, it's stated that this is a strategic plan; however, we do not believe that this document is a plan, nor is it strategic. Finally, the timing of the release of this document fails to recognize the looming public health crisis ahead of us if people experiencing homelessness are not stably housed and if those facing evictions do not receive the support they desperately need.

Some of the actions outlined in the document are actions we promote, such as employment, housing prevention, and trauma-informed care. However, even the most effective activities implemented by homeless response systems lose effectiveness when they are simply a collection of unconnected interventions. For our communities to successfully make homelessness rare, brief, and non-recurring, Texas' homeless response systems should be strategically aligned. This involves all Continuum of Care (CoC) partners, including all service providers (secular and faith-based) and federal, state, and local governments, regardless of how they are funded. The council cannot implement the response that is outlined in this document. Any national strategic plan that does not outline how federal agencies should align and contribute to the goal of ending homelessness is not strategic and certainly not a plan at all. A strategic plan must outline the goals we are setting out to achieve and the roles everyone working in homelessness will play to achieve those goals.

While some actions described in the report are appropriate in homeless response systems, the interventions omitted and pilloried in this plan are of more significant concern to THN and its partners. First, this response does not contain the evidence-based best practices that have been proven through the objective analysis of data to reduce and end homelessness. These are interventions that have been championed by administrations from both sides of the political spectrum. Among these best practices is the utilization of a Coordinated Entry (CE) strategy. This mechanism shifts homeless systems' response methods from project-centric to person-centric and based on community-level standards for referrals and program entry. Coordinated Entry also ensures that scarce homelessness resources are triaged based on community-determined needs and

priorities, rather than project-determined ones. The omission of CE from this publication is glaring and concerning.

A best practice that is regularly attacked by USICH in this document is Housing First as a strategy. This document attempts to devalue and delegitimize Housing First. It goes so far as to make broad generalizations about the efficacy of the Housing First model that even suggests it has contributed to homelessness increases. This language is harmful, ill-informed, and unfounded. An objective review of the data will show that Housing First is effective and more efficient than past models. "Expanding the Toolbox" mischaracterizes what Housing First is and paints it as a rigid approach that disregards individual and community needs. [Housing First is not "housing-only"](#) but instead a flexible, varied philosophy to best meet households' and communities' needs.

We encourage the USICH to work with Continuums of Care (CoCs) across the country to develop a plan that accurately represents what is happening in homeless services as well as larger factors that influence how effectively homelessness can be addressed. Agencies providing assistance in homeless response systems in Texas and across the country recognize the overwhelming barriers people experiencing homelessness face when attempting to escape this condition. For example, the report does not focus on the need for more affordable housing in nearly every community so that people can move out of homeless situations and into housing they can afford. Also, it does not acknowledge the significant increase in rental housing costs in most areas, especially in relation to wages. Strategies that effectively end homelessness have been identified but not adopted at a scale that would dramatically impact the number of people experiencing homelessness. For example, a key strategy that would lead to a decrease in homelessness is ensuring that every household that qualifies for subsidized housing can access and live in that housing, not languish on a waiting list for several years. Other strategies include ensuring adequate income, medical care, mental health care, and other supportive services for every person who needs them. Only once those strategies are implemented, can we then assess how "well" the homeless services system is performing.

Ultimately, the release of this document by USICH suggests that leadership on the national level fails to recognize the immediate danger that people experiencing homelessness face daily, especially during the COVID-19 pandemic. Homelessness and COVID-19 are two concurrent crises that disproportionately impact Black and Latino Texans the most. Current HUD policies make it more difficult for local communities to focus services and funding to populations most affected by homelessness. It's vital that Texans, organizations like THN, and businesses with a major presence in Texas communities, recognize the seriousness of the situation that people at-risk of or experiencing homelessness face and how their condition can contribute to adverse health outcomes for themselves as well as the ongoing health crisis. Homelessness and the instability and lack of protection that comes with it make people experiencing it more susceptible to infection and more likely to contribute to rising rates of the virus across the greater community. Texas has the highest rates of uninsured residents and a continued pandemic is all but sure to impact low-income people, including those experiencing homelessness the most. This reduces the health and wellness of a community and affects greater socio-economic prosperity for all citizens. This report fails to

address the precautionary measures that homeless response systems should take, and the importance of averting the looming eviction crisis makes it a rudderless plan and reckless.