



Good Morning,

My name is Michele Salters Williams and I am Chief of System Integration for the Community Partnership for the Prevention of Homelessness. Thank you for this opportunity to provide feedback on the FY 2014 Budget Support Act and specifically the proposed amendments to the Homeless Services Reform Act.

Today, the Community Partnership manages nearly \$80 million on behalf of the District and the U.S. Department of Housing and Urban Development. The majority of this funding from the District comes through the Department of Human Services. This money funds 114 programs for homeless individuals and families, run by 41 providers.

The Homeless Services Reform Act is the most significant piece of legislation affecting the day to day work of the District's Homeless Service providers. Since its inception, it has changed how services are delivered and improved the system in some ways. Homeless providers have adjusted their program structures, policies and guidelines to ensure that they work within the requirements of the law at all times. The Community Partnership has offered extensive training to providers to help them understand and implement the law and has been continually responsive to issues raised by the advocate community. The HSRA is not a perfectly written document as I am sure we can all agree. There are specific areas of the legislation that are unclear and contradictory. It also is not reflective of the advances and best practices of homeless service provision that the District is implementing today. The HSRA does not reflect the needs of a system that has shifted from being overwhelmingly shelter based to being 60% community based. It also does not reflect the more thorough assessment process that is now included at the newly integrated Virginia Williams Family Resource Center.

The proposed amendments are the result of numerous discussions that have been held over the years with individuals and families served, homeless service providers and the daily contact we have with the advocate community. It is not the role of the homeless system to eradicate poverty in the District but it is our role to ensure that those who find themselves homeless have the same opportunities to better their situation that all of us have.

Mandatory Escrow – This amendment has been termed inappropriately. What we are really discussing are **Asset Building Strategies**. The same types of asset building strategies that we all seek, access to financial education opportunities, debt counseling and credit repair, and access to low-cost checking and savings accounts. The Corporation for Enterprise Development now known as CFED recently published a guide entitled Integrating Financial Empowerment Strategies into Housing and Homelessness Prevention Programs. This guide recommends specific Asset Building Strategies that local entities can use for those at various stages of financial security. For those currently homeless and at risk of homelessness they recommend:

- Requiring financial education and savings programs as part of emergency assistance
- Providing assistance gaining necessary identification to open bank accounts
- Building the capacity of case managers to connect individuals to a range of asset building strategies

This amendment has been described as punitive however I can see nothing punitive about helping families achieve a higher level of financial empowerment. In the same way that we all seek to participate in savings and investment programs such as 401k and 403B plans, Roth IRA,s and other financial tools to help us achieve financial goals, we should be able to assist our homeless neighbors as well. It is time that we started helping District residents at all income levels to build a safety net for themselves and their families.

Provider Premises – The proposed amendment expands the current HSRA definition to include those publicly or privately owned apartment units in which the tenant is receiving a subsidy or other services under a shelter or supportive housing program. This expansion mirrors DCHA regulations that permit services to be ended for those who may be engaging in unlawful behaviors, such as the sale of illegal drugs or the possession of illegal weapons in the home. These incidents are not common but when they occur the homeless provider and DHS have had no ability to terminate government support for these individuals. We have been forced to continue financial and programmatic support even when the tenant was facing legal action and the landlord was threatened with seizure of the property.

Provisional placement status – The HSRA currently allows for a three day grace period for the determination of eligibility. There are times when it is necessary to obtain information that may take additional time to obtain. The provisional placement amendment would allow the District to offer placement until all necessary documentation is received without being obligate to continue services for those who may be found ineligible after all information is obtained. This amendment fills the gap in the HSRA while allowing a more thorough assessment of each situation while not endangering the family.

The decisions regarding eligibility and priority determination are very serious decisions and we need to be able to be as thorough as possible in making them.

Rapid Rehousing – The District has been a leader in the establishment of Rapid Rehousing Programs for many years. The Community Partnership developed one of the first programs of this type in 1998, Community Care Grant. Since then, other communities have developed their own approaches and Rapid Rehousing has become a national best practice due to success rates higher than any other program type. The focus on rapid rehousing was further emphasized with the passage of the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. Locally, the District's Rapid Rehousing initiatives have achieved a 90% success rate in helping families obtain and maintain housing in the community and not have to return to shelter. Rapid Rehousing is a valid offer of housing and must be counted as such in the legislation. Over the last 6 months, the homeless continuum has been fortunate to be able to provide thorough assessment of families through the use of the Service Prioritization Decision Assistance Tool. With the support of the Freddie Mac Foundation, Community of Hope and Transitional Housing Corporation have conducted over 500 assessments of families at DC General and across the continuum. This nationally recognized tool provides an assessment of the level of support services a family needs going forward. Over 80% of the families have been assessed as needing short term supports in the form of rapid rehousing. This data is consistent with the outcomes on a national level.

Two Year limit on transitional housing – When created, the HSRA turned transitional housing programs into lifetime programs by indicating that the program length had to be as long as necessary. This definition without the time limit has unnecessarily created a bottleneck in the homeless system by discouraging participants from leaving and creating space for other families in need. The federal definition of transitional housing has always been up to 24 months and the proposed amendment provides needed clarification for homeless providers.

The proposed amendments are intended to improve flow of families through the system, move families out of homelessness more quickly, emphasize effective programming and develop asset building strategies. The Community Partnership fully supports the proposed HSRA amendments and pledges its commitment to working with DHS to ensure that each measure is implemented in a manner that continues to ensure the due process rights of those receiving homeless services.