

# HEARTLAND ALLIANCE

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

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Thank you for the opportunity to provide feedback on the U.S. Interagency Council on Homelessness' (USICH) forthcoming 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 the areas of health and healing, safety and justice, and economic opportunity. Headquartered in Chicago, IL, we work to end poverty and advance equity and opportunity for all, including through preventing and ending homelessness. In 2020, we served 216,000 program participants and impacted over 5.6 million people through our policy and advocacy work.

Our response to USICH's request for feedback on the forthcoming federal strategic plan to prevent and end homelessness reflects Heartland Alliance's breadth and depth of issue area expertise. In crafting our response, staff from Heartland Alliance's Impact Division gathered input from 17 staff members across the Alliance's companies, including staff with lived experience of homelessness, staff working directly with adults and youth experiencing or at risk of homelessness, and staff working on policy and systems-level solutions to prevent and end homelessness.

As a human rights organization, Heartland Alliance affirms that housing is a human right and upholds the right to housing as one of our core values relative to preventing and ending homelessness. We also understand that structural racism is a root cause of homelessness and that racial discrimination in housing, employment, education, healthcare, the criminal legal system, the foster care system, and other systems drive the high rates of homelessness among people of color and Black people in particular. As a result, Heartland Alliance believes **it is imperative that the federal response to prevent and end homelessness center racial equity in its approaches and address the underlying and intersectional root causes of homelessness.**

Heartland Alliance is pleased to see that under the Biden-Harris Administration, USICH has taken a step toward centering racial equity and addressing the root causes of

homelessness by committing to values that include racially equitable access to housing and the systems that help people stay housed, the use of Housing First approaches, the decriminalization of homelessness, and the inclusion of people with lived expertise in shaping solutions. We urge USICH to uphold these values in the new federal strategic plan to prevent and end homelessness while deepening its commitment to housing as a universally-accessible human right.

Heartland Alliance's specific responses to USICH's questions about the new federal strategic plan to prevent and end homelessness are below.

### **1) What should the federal government's top priorities be for preventing and ending homelessness?**

A first top priority for the federal government in preventing and ending homelessness is to **make robust, sustained investments in deeply affordable housing that is designed to reach people with the lowest incomes.** Staff at Heartland Alliance indicated that without these types of housing investments, efforts to prevent and end homelessness are akin to "running around trying to plug holes" in a broken system and will ultimately be unsuccessful. Federal investments in deeply affordable housing options must also be coupled with investments in voluntary supportive services that can be tailored and available as needed to help people who may face barriers to staying housed achieve long-term housing stability. To advance racial equity and justice, investments in deeply affordable housing must redress decades of segregation. Heartland Alliance staff noted that Chicago's most affordable housing options are in extremely segregated neighborhoods with little access to transportation, high-performing schools, work, and other assets. For people and communities to thrive, deeply affordable housing must be built across different neighborhoods and geographies.

A second top priority for the federal government is to **curtail the overreach of the criminal legal system on people's ability to access housing or work, including by dismantling collateral consequences for people with records.** Collateral consequences or, as we call them, permanent punishments, are legal and policy barriers that deny or restrict rights and opportunities, such as housing or employment access, for people with records - long after their involvement with the criminal legal system is over.

Having a record makes it exceptionally difficult, if not impossible, for individuals and their families to access safe and stable housing. In the private rental market, application processes often screen out applications for people with records. Dismissed charges,

arrests, or even expunged convictions can also show up on background checks. Federal laws restrict people with certain types of records (notably, drug offenses) from living in public or subsidized housing, and public housing authorities have significant discretion relative to restricting people impacted by the criminal legal system. **Because of the disproportionate impact of the criminal legal system on people of color, especially Black men, housing-related permanent punishments contribute to racialized patterns of housing instability, segregation, and homelessness.** USICH's commitment to decriminalizing homelessness is important, but doing so will not stop the criminal legal system from being a driver of homelessness and housing instability. In addition to supporting efforts to decriminalize homelessness, the federal response to homelessness must also ensure that being impacted by the criminal legal system is never a reason to deny someone housing - or a job.

Dismantling permanent punishments will go a long way toward achieving a third top priority for the federal government: to **expand access to employment and economic opportunity for people experiencing or at risk of homelessness.** To achieve this priority, the federal government should **invest in evidence-based workforce development strategies designed for and targeted to people experiencing or at risk of homelessness**, including investments in [subsidized employment and Transitional Jobs strategies](#) as well as [Individual Placement and Support \(IPS\)](#) supported employment. While firmly committed to Housing First, Heartland Alliance staff noted that it could be beneficial, especially for youth, for the federal government to couple affordable housing solutions with voluntary, evidence-based workforce development services and supports in order to ensure [equitable access to employment for people experiencing or at risk of homelessness](#).

Expanding access to economic opportunity for people experiencing homelessness also means that **the federal government should ensure that all jobs are good jobs.** In addition to investing in deeply affordable housing, the federal government can help close the gap between what jobs pay and housing costs by raising the federal minimum wage to \$15/hour. The federal government also must prioritize ensuring that all workers have paid sick days, paid leave, predictable scheduling, flexibility, and the right to organize, and must enforce existing worker protection and safety laws.

Finally, the **federal government should support guaranteed incomes for individuals and families with low or no incomes.** As discussed below in response to question #4, Heartland Alliance staff found that cash payments to individuals and families experiencing homelessness during the COVID-19 pandemic significantly improved their near-term economic situation. Ensuring ongoing, direct cash transfers to

individuals and families with low or no incomes can mitigate poverty and homelessness and open pathways to economic mobility.

## **2) What are the biggest barriers to preventing and ending homelessness in your community?**

Heartland Alliance recognizes that homelessness is a failure of systems, not of people. Staff across Heartland Alliance named many systems-level barriers that perpetuate homelessness among the participants they serve as well as in their own neighborhoods and communities. Systems-level solutions to some these pervasive barriers inform the above-identified top priorities for the federal government in preventing and ending homelessness. The biggest barriers to preventing and ending homelessness that staff identified include:

- **Lack of deeply affordable housing:** There is not enough deeply affordable housing for all people who need it, and there is not enough deeply affordable, quality housing in resourced communities where people want and deserve to live. Widespread NIMBYism, rooted in racism, is an ongoing challenge for affordable housing developers such as Heartland Alliance that are seeking to build new units targeted to people who have very low incomes.
- **Limited supportive services dollars:** There is limited funding for voluntary supportive services for people facing barriers to achieving housing stability. In particular, there is limited funding for housing that is paired with supportive services for people who have a mental health disorder and/or a substance use disorder. Staff noted that landlords are often hesitant to rent to people who have experienced homelessness if the housing is not paired with supports.
- **Permanent punishments:** Permanent punishments exclude people with records, who are disproportionately people of color, from accessing housing and employment and are major drivers of homelessness and racial inequity. The **criminalization of homelessness** contributes to the proliferation of permanent punishments and results in more barriers to housing and employment, especially for people of color who are experiencing homelessness.
- **Limited access to employment and economic opportunity:** A combination of 1) permanent punishments that exclude people with records from the labor market; 2) limited investments in employment programs designed for and targeted to people experiencing homelessness; and 3) the prevalence of low-wage, low-quality jobs that pay too little for people to afford housing act together to create significant barriers to preventing and ending homelessness.

In addition to these barriers, staff also noted that insufficient access to quality child care, delays in processing visas for people who are undocumented, limited services and supports for survivors of human trafficking and domestic violence, the prevalence of evictions and landlords' ability to reject rental applications from people with evictions, and too-short timelines for housing interventions such as rapid re-housing or housing programs for [youth transitioning from care](#) are all barriers to preventing and ending homelessness.

### **3) How can the federal government more effectively center racial equity in preventing and ending homelessness? How can the federal government support equitable access and outcomes at the local level?**

Heartland Alliance identifies [structural racism as a root cause](#) of homelessness. [Racial discrimination across a range of systems](#), including in housing, employment, education, healthcare, the criminal legal system, the child welfare system, and others, results in deep racial disparities in homelessness. **To more effectively center racial equity in preventing and ending homelessness, the federal government must address the myriad and interconnected root causes of homelessness. This means undertaking bold, justice-oriented initiatives that redress centuries of structural racism.** Drawing from the top priorities for federal action identified above in response to question #1, these types of initiatives could include, among others: 1) affirming that housing is a human right and investing in deeply affordable, high quality, and universally-accessible housing at scale; 2) dismantling permanent punishments so that it is no longer legal to deny people housing or employment because they have a record or have been impacted by the criminal legal system; and 3) guaranteeing that all would-be workers can access a quality job, resulting in the wholesale elimination of involuntary unemployment.

With the recognition that these types of transformative, justice-oriented initiatives will take time and broad buy in both inside and outside of government to achieve, Heartland Alliance also recommends the following near to middle-term actions for more effectively centering racial equity in preventing and ending homelessness:

- **Center lived experience in shaping and implementing solutions:** [People closest to the problem are also closest to the solution](#), but often farthest away from resources and power. To center racial equity in solutions to homelessness, it is essential to redistribute resources and power by engaging - and paying - people of color with [lived experience of homelessness in all efforts](#) to develop programs, set public policy, conduct research, and redesign systems. Heartland Alliance recommends that USICH include people of color with lived experience of homelessness in decision making and leadership roles alongside other members

of the interagency council. While implementing this recommendation would reflect a change to the council's current governance structure, we believe it would go a long way toward ensuring that systems and solutions are designed, informed, and managed by people with lived experience of homelessness.

- **Build robust connections among public systems:** Homelessness is a failure of multiple public systems, including the failure of public systems to build meaningful connections that can help people get and stay housed. Children, youth, and adults of color are at risk of experiencing homelessness due to their over-representation in systems such as the foster care system, juvenile justice system, and criminal legal system. While it is preferable to greatly reduce the overreach of these systems, it is also imperative that these systems have [robust connections with other public systems](#) to support successful transitions that do not result in homelessness or housing instability. Additionally, people who are experiencing or at risk of homelessness may be seeking or receiving services and supports from across different public systems, but no single system has the resources, capacity, or expertise to solve homelessness on its own. Therefore, Heartland Alliance recommends that USICH and its member agencies help these systems build and maintain connections and referral systems so that communities have a continuum of resources, services, and supports that can work together to prevent and end homelessness.
- **Use data and performance metrics to hold federal agencies and communities accountable to racial equity goals:** Both federal partners and communities must be held accountable for advancing racially 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, including long-term housing 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. At the community level, it is also important that recipients of homeless service funding can demonstrate that they are implementing solutions that are reaching people of color equitably and are resulting in racially equitable outcomes. Technical assistance and support should be provided to communities that are struggling to achieve racially equitable service provision and outcomes.
- **Fund homeless service programs that prioritize healing, are trauma-focused, and are grounded in harm reduction principles:** People of color are more likely to have [experienced the multiple traumas](#) that accompany

homelessness, poverty, prolonged unemployment, incarceration, and violence. It is imperative that solutions to homelessness put forward by USICH and its member agencies do not result in further harm to individuals and communities by centering healing, recognizing and addressing trauma, and meeting people where they are, without judgment, through [harm reduction techniques](#).

#### **4) What lessons have you learned during the COVID-19 pandemic about how housing, health, and supportive services systems can best respond in order to prevent and end homelessness?**

As a provider of housing, healthcare, and support services, Heartland Alliance recognizes that the COVID-19 pandemic, and its ensuing economic recession, has been particularly devastating to people with low incomes and people and communities of color, including people experiencing homelessness and housing instability. With this in mind, however, Heartland Alliance staff recognized some bright spots and lessons learned from the pandemic about how systems can best respond to prevent and end homelessness.

The COVID-19 pandemic has demonstrated that in a moment of crisis, **it is possible for public systems to move quickly, leverage available housing and related resources, and implement more flexible move-in processes and uses of funds to get people experiencing homelessness inside to adequate and comparatively safe shelter.** These efforts, which have included expanding outreach to connect with people who may be more resistant to entering housing, have been more effective when they are coordinated and guided by the priorities set by state and local governments. **People's willingness to enter temporary housing when they could have their own space, such as a motel or hotel room, has also demonstrated that non-congregate housing options work.** Heartland Alliance staff noted that for myriad reasons, all of which were augmented due to the pandemic and COVID-19's rapid spread in close quarters, people do not want to be "housed" in crowded, congregate settings. The pandemic has shown that it is imperative for the homeless service system to move away from congregate settings and continue to provide people with individualized housing options that are paired with voluntary services and supports, including access to medical care.

Another important lesson from the COVID-19 pandemic has been **the value of direct cash payments to people experiencing or at risk of homelessness.** Heartland Alliance staff indicated that both the stimulus payments and the expanded child tax credit have made "massive" improvements in people's economic situations, including by giving people extra money to pay rent to a landlord or to pay a family member or friend

to stay with them. As one staff member put it, “Cash is best, absolutely.” As noted in response to Question #1, Heartland Alliance recommends that as part of its work to prevent and end homelessness, the federal government should support guaranteed incomes for individuals and families with low or no incomes.

Alongside these bright spots, the pandemic also has exposed deep health care inequities and the existing weaknesses in a variety of public systems. For example, limited federal investments in robust, trauma-informed health care services for people experiencing homelessness, and especially mental health care services, exacerbated the impact of COVID-19. Heartland Alliance staff have found that many people in their programs have been resistant to COVID-19 testing or vaccinations, likely resulting from distrust in available systems of care. **Heartland Alliance recognizes that continuing to vaccinate people in the United States for COVID-19 is top federal domestic priority, and urges USICH and its member agencies to support the ongoing vaccination of people experiencing or at risk of homelessness.** Vaccinating people experiencing or at risk of homelessness is critical to ending the pandemic as well as making it safer for people to seek and receive housing services.

Finally, COVID-19 has also highlighted the need for equitable access to up-to-date technology and the internet for people experiencing or at risk of homelessness. As physical offices have closed or reduced their in-person hours, many basic assistance programs and services increasingly have operated online. While the move to online services has increased COVID-19 safety, many people experiencing or at risk of homelessness do not have the hardware and access to the internet necessary to file for assistance programs online or seek virtual social services. The federal government must continue its work to ensure that people with low or no incomes have the tools and resources to access the internet. Simultaneously, as the disastrous rollout of unemployment insurance demonstrated, federal agencies must invest in back-end technology systems so that online social service delivery is timely and user friendly.

**5) Is there anything else you wish to add related to the federal government’s role in preventing and ending homelessness?**

With regard to whether or not a new federal strategic plan to end homelessness should have goals to end homelessness among specific subpopulations, Heartland Alliance recommends that the plan pursue a [targeted universalism](#) approach. A targeted universalism approach would mean setting a universal goal (e.g., to ensure all people in the United States are safely and stably housed) pursued by targeted processes to achieve that goal (e.g., strategies developed and implemented for ensuring all young people are safely and stably housed). A targeted universalism approach is inclusive, recognizes that groups of people are situated differently and therefore need different

strategies to achieve the universal goal of ending homelessness, and does not fall into racialized and gendered tropes that certain groups or “types” of people are more deserving of housing than others.

Heartland Alliance staff had additional feedback and suggestions related to the federal government’s role in preventing and ending homelessness. Some of the ideas and comments that surfaced include:

- The federal government should streamline the definition of homelessness 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.);
- Federal funding for homeless services should be more flexible and have incentives for cross-system coordination and collaboration;
- The homeless service system is in a prolonged hiring and retention crisis, due to chronic low compensation and unrealistic expectations put on staff. The field needs investments in personnel, compensation, and professional growth opportunities.
- Communities need support in effectively implementing Housing First approaches, including support in training organizations and staff to understand what Housing First is, why it matters, and how to structure Housing First approaches.
- Credit scores should not be used to determine if someone can rent housing. Many [households of color have been denied access](#) to the financial tools needed to build credit, resulting in a stark racial disparity in credit scores. Using credit scores to determine access to housing perpetuates racial inequity.

Thank you very much for your consideration and the opportunity to provide feedback on the forthcoming federal strategic plan to prevent and end homelessness. Please do not hesitate to contact Caitlin C. Schnur at Heartland Alliance for further information.

Sincerely,

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