To the Division of Federal Financial Assistance for the State of California

Subject: Public Comment Period for the State of California 2020-2024 Federal Consolidated Plan Annual Action Plan One Year Use of Funds Fiscal Year 2021-2022

The National Coalition for Homeless Veterans (NCHV), along with our network of members and partners, is focused on what can be done to achieve an end to veteran homelessness, particularly in areas where there has been an increase in recent years. Because of the COVID-19 pandemic, there have been major shifts in housing needs for those experiencing homelessness at large. Affordable housing has become even more critically important, and a sense of urgency to resolve the housing crisis has been reenergized across the country. To that end, NCHV makes several suggestions as to how the plan can improve your community’s ability to address homelessness.

Utilize Additional Data and Stakeholder Input to Inform Affordable Housing Funding Allocations

The most recent Point in Time (PIT) Count suggests that as a state California has seen an increase in veterans experiencing homelessness in the last several years. More specifically, throughout the state, veteran homelessness increased 3.8% between 2019-2020. While there have been considerable increases in larger metropolitan areas throughout the state, there have also been increases in Continuum of Care (CoC) service areas, including non-entitlement jurisdictions, which fall under California’s Department of Housing and Community Development (HCD) coverage areas for the Annual Action Plan.

Because of the direct link between affordable housing availability and homelessness, PIT data should influence how money is spent for affordable housing programs as well as programs targeted to those experiencing homelessness, geographically. A good measure of how successfully money is being used is looking at the number of people served in conjunction with major fluctuations in PIT data. Additionally, like Emergency Solutions Grants (ESG) funding considers PIT data, HOME Investment Partnership Program (HOME) and National Housing Trust Fund (NHTF) allocations should as well. Though these sources are not designed to only serve those experiencing homelessness, more effort should be made to make sure this funding reaches individuals and families with the most critical needs, and not just projects that initially appear the most easily feasible.

Prior to publishing the current Consolidated Plan and amended Annual Action Plan, HCD conducted a needs assessment including a survey, to inform the priorities for upcoming years. Although veterans were included in the community’s identified priority populations, there seems to be an underrepresentation of actual need considering the disproportionate share of veterans that make up the top 5 populations of focus- persons experiencing homelessness, persons with mental illness, elderly households, families experiencing homelessness, and persons with substance use disorders. HCD has committed to focusing on equity in the current Annual Action Plan’s distribution and activity. To effectively do this, subpopulations within priority populations need to be given additional consideration.

In the future, NCHV encourages HCD to actively invite veteran serving agencies, Veteran Service Organizations (VSOs), The Department of Veterans Affairs (VA), veteran housing providers, and others who can speak on veteran housing issues, to participate in stakeholder sessions and surveys. This assures that moving forward Annual Action plans can be designed in a way that accurately addresses the needs of veterans experiencing homelessness, both geographically and especially within other priority populations.

Consider Additional Project Types as Priorities for Funding

The anticipated slow economic recovery and increasingly desperate affordable housing crisis disproportionately impact those experiencing and at-risk of homelessness. We are expecting continued fallout for veterans experiencing homelessness, particularly those with compounding housing barriers, long after the initial chaos of the pandemic has ended. While the Annual Action Plan does mention the flexibility that comes with serving those experiencing homelessness during a health emergency, there is no reference to what specific types of projects would be prioritized to do so.

NCHV encourages HCD to consider the following types of projects as priorities for HOME and ESG allocation for this year and beyond—

* hotel/motel conversions where jurisdictions, nonprofits, or affordable housing developers have leveraged funding for veterans to provide affordable housing moving forward;
* projects where jurisdictions, nonprofits, or affordable housing developers are de-congregating shelters for veterans experiencing homelessness;
* and projects where increased operational funding would allow providers to serve a mix of these two housing types more effectively.

Incentivize Using Veteran Housing Resources to Leverage HCD’s Funding Allocations

The Annual Action plan considers the use of other sources in conjunction with funding awards but does not specify how multiple applications to HCD utilizing other federal, state, and local sources would compare to each other. In the distribution of HOME, ESG, and NHTF, preference should be given to jurisdictions that have written a formal plan to end homelessness and use this plan to inform how funding would be spent. By further specifying what applications would be prioritized and what funding types should be sought to use in conjunction with those HCD manages, more assurance can be made that these limited resources reach those with the most pressing housing needs.

We realize there are committed federal, state, and local resources targeted to veterans experiencing homelessness, including California’s VHHP program, Veterans Affairs Supportive Housing Vouchers (HUD VASH), Supportive Services for Veteran Families (SSVF), Grant and Per Diem shelter (GPD), and recently released capital grants for GPD de-congregation. However, we also want to emphasize the effect layering other federal funding can have on furthering the impact of these resources. Performance evaluations from prior year’s Annual Action Plans suggest jurisdictions awarded funding through HCD, have stretched ESG and HOME allocations to serve more than the anticipated number of individuals experiencing homelessness. To further extend these funds HCD should be allocating larger shares to jurisdictions that have identified opportunities to use these funds in conjunction with other targeted sources for those experiencing homelessness, including veterans.

NCHV applauds HCD’s commitment to affordable housing, addressing concerns highlighted throughout COVID and focus on equity in this year's Annual Action Plan and beyond.

Sincerely,

Jasmine Bazley

Housing Program Associate

National Coalition for Homeless Veterans