



Solutions Utah Response to Request for Public Comment

Utah Homelessness Council Strategic Plan

The severity and visibility of people living in destitution on the street of Utah is of significant concern. It is important that the State utilize every tool to solve this humanitarian crisis. The State cannot, however, focus solely on one intervention without understanding the impacts and negative consequences on the broader community.

Solutions Utah is a collection of businesses, residents, and community leaders concerned with the effectiveness and accountability of State and local funding and programs intended to address homelessness. The coalition seeks a balanced and comprehensive approach to addressing homelessness and its impacts on the community.

After carefully considering the draft strategic plan, Solutions Utah offers the following comments:

GOAL 1. Increase accessible and affordable permanent housing opportunities for people experiencing homelessness across the state.

Concerns: The goal presumes that increasing the amount of affordable housing decreases the number of people experiencing homelessness. The problem of this notion is that it has yet to be demonstrated to scale. This is due to two factors: 1) creating housing at scale for any kind of housing is a significant and expensive challenge, and 2) the population experiencing homelessness is often negatively inclined to accept housing and services.

One of the “outcomes” for goal 1 is to “launch a statewide social marketing campaign... to less community resistance to development of permanent housing...” The idea of spending public money on a marketing campaign directed to the public to increase support for PSH is concerning. Also, the plan

should address the real reason that the public may be resistant to permanent supportive housing; that is permanent supportive housing often attracts crime and drug use. Rather than using a media campaign to influence perception, the state should take tangible steps to provide better security, management, accountability, and control over the facilities.

Recommendation. The report should acknowledge that housing is the solution for only a portion of individuals experiencing homelessness. We suggest adding a Goal 7 (described below) which addresses the need to provide options for those who are not ready for housing.

Goal 2. Increase access to and availability of supportive services and case management for people experiencing and at risk of homelessness.

Concerns: This goal presumes that increasing the availability of mental health and substance abuse services will lead people to accept those services. This is not always the case. The plan does not address the problem of how to approach those unwilling or uninterested in receiving treatment. In fact, many individuals are unwilling to accept treatment even after they receive housing. This is a challenging problem which is not addressed in the plan.

Recommendation: Drop those items under Measurable Outcomes for Goal 2 which are process oriented. Replace them with a goal to increase the number receiving treatment for their mental illness and substance abuse disorder. Also set a goal to identify and reduce the number who return to homelessness after receiving treatment.

Goal 3. Expand homeless prevention efforts by increasing coordination, resources, and affordable housing opportunities.

Concern: The research shows that prevention programs offer short term benefit that they may help a family postpone an immediate housing crisis. Such programs do not help families achieve long-term housing stability.

See "[The Impact of Homeless Prevention on Residential Instability: Evidence from the Homeless Prevention and Rapid Re-Housing Program](https://bit.ly/2CtqT8J)," available at: <https://bit.ly/2CtqT8J>.

Recommendation: Monitor the outcomes of prevention programs by identifying the number who received services and who remained housed after two years.

Goal 4. Target housing resources and supportive services to people experiencing unsheltered homelessness.

Concern: We support the creation of sanctioned encampments if they are viewed as temporary facilities where clients can be stabilized, offered treatment, and prepared for housing. However, the "strategies to achieve goal" presume that increased housing is the solution for the unsheltered, not recognizing that many unsheltered are not ready for housing. The plan needs to explain how we can best serve those who are resource and housing resistant.

Recommendation: Replace Goal 4 with "Create a range of shelter and service options for people experiencing unsheltered homelessness." Include among the service options, sanctioned encampments, and mental health and drug addiction treatment.

Recommendation: Once temporary facilities are provided, the no camping laws should be enforced. Teams of police and outreach workers should actively encourage the unsheltered to enter facilities.

Goal 5. Promote alignment and coordination across multiple systems of care to support people experiencing and at risk of homelessness.

Comment: This is an important feature of any homeless services system, but the COCs should be doing this already. The plan should clarify what more can be done than what is already being done. If the intent is to do more along the

lines of Judge Leifman's Sequential Intercept Model program in Miami-Dade County, those goals should be clearly articulated.

We view the proposal to increase data sharing among agencies as a positive step.

Add a Goal 6: Prepare a Set of Goals and Strategies for Addressing the Negative Impacts of Homelessness on the Community.

Concern: The plan needs to recognize the relationship between homelessness and disorder, including rising crime and offer a plan to reduce crime in proximity of facilities serving those experiencing homelessness. Police reports show high rates of crime and police calls to the shelters and housing facilities provided to the homeless. In addition, drug use in permanent supportive housing facilities is a concern. Finally, court records show 80 percent of the habitual criminals in Salt Lake County have been homeless. About 50 percent of the habitual offenders are long term homeless who have spent years cycling in and out of shelters, encampments, and jail.

At the end of the last state council meeting, Mayor Mendenhall suggested adding a 6th goal related to the effort to create a special intervention patterned after the Miami-Dade program she and other local leaders recently observed. We support adding a 6th goal supporting a court directed diversion program for not only the mentally ill, but also for all individuals who are suffering from substance abuse disorder.

Recommendation: Add a Goal 6. Expand diversion options for individuals experiencing homelessness who are also involved in the criminal justice system.

Recommendation: Include on the Joint Strategic Plan Implementation Committee, representatives of small business and residents who currently live near existing Homeless Resource Centers to strategize about ways to decrease the negative effects these resources have had on the surrounding community, including property crime and quality-of-life issues.

Add a Goal 7: Create an Alternative Response for those Individuals Experiencing Homelessness who are not Ready for Housing.

Concern: Wayne Neiderhauser has frequently described the challenge of helping those who are not housing-ready due to mental illness and addiction. This problem is not adequately described in the report. Instead, the report relies on recommendations by “providers” and “survey respondents” to conclude that permanent supportive housing is the best option. The evidence suggests a more robust response than permanent supportive housing is needed for this population. The widespread use of drugs by residents in permanent supportive housing is not realistically acknowledged which makes it difficult for those trying to obtain or maintain recovery. It is naïve to think that a program participant experiencing substance use disorder can receive services and overcome substance use disorder if the neighbor is using drugs and is offering them to others in the facility.

A study of permanent supportive housing in Boston concluded that “Long-term outcomes for this permanent supportive housing program for chronically unsheltered individuals show low housing retention and poor survival. Housing stability for this vulnerable population likely requires more robust and flexible and long-term medical and social supports.”

See Housing Boston’s Chronically Homeless Unsheltered Population 14 Years Later. Jill S. Roncarati, ScD, MPH, PA-C,* Henning Tiemeier, MA, MD, PhD,†‡
Rebecca Tachick, BA,§ Tyler J. VanderWeele, PhD,||¶ and James J. O’Connell, MD#

Of course, the effectiveness of permanent supportive housing facilities depends on how well the facilities are managed. Our assessment is that permanent supportive housing facilities in Utah often are poorly run, are not held accountable for measurable outcomes, have lax security, fail to offer service-rich supportive services, and do not provide robust case management.

Recommendation: Acknowledge that many mentally ill and those suffering from addiction may not thrive if they are living alone in an apartment, especially if the treatment options are inadequate or optional, or if drug use is common among other residents.

Recommendation: Add a Goal 7: Create a robust set of service options for those who are unsheltered and suffer from mental illnesses and substance use disorder. Care options should include residential facilities which provide intensive treatment and supportive services, from which individuals can transition to communal living, where they can live in a supportive environment, and then eventually move into independent housing.

The Plan Lacks True Outcome Measures. Most of the “Measurable Outcomes” described in the Plan are Actually Strategies and Action Steps.

Concern: It appears the planners have confused strategies and action steps with outcome measures. For example the following is an action step: “by 2023, the Utah Homeless Network will establish a working group to coordinate supportive services efforts... .” While this may be an important step towards helping people get the services they need, it isn’t the ultimate goal.

A better measure of performance might be to “reduce the number receiving substance abuse treatment who afterwards returned to homelessness.”

Recommendation: For each goal, move the action steps under the heading “strategy to achieve goal” and create a separate list of measurable outcomes that identify the actual results you hope to achieve.

The Dates for Accomplishing Goals are Too Far in the Future, Some Goals Appear Arbitrary.

Concern: There are goals to achieve certain benchmarks by 2025, one is even in 2030. It is hard for people to focus their attention on and be held accountable for results that are not expected for many years in the future. An effective accountability system requires that goals be clearly defined, steps to accomplish the goals are clearly identified, and the lines of responsibility for their implementation are clearly identified, and the progress made towards achieving those goals are reported on a regular basis, every month or quarter if possible, or at least annually. We are concerned that goals have been sets without each of these steps being taken.

Concern: It appears that not much thought went into setting the performance goals. Several measurable outcomes are set at a 5 percent reduction. We wonder if there is a basis for those goals or if they were simply set by default. What confidence does that Council have that a 5 percent reduction can be achieved for key subpopulations if the strategies in the plan are carried out?

Recommendation: Shorten the period for reporting progress towards achieving goals. Make sure the goals are measurable, realistic, and related to the ultimate objective not just the action steps. Also, identify the staff and financial resources needed to achieve each goal. For example, consider reporting the number on the “by-name” list of chronic homeless, victims of domestic abuse, veterans, and those who were placed in housing each month, each quarter, or each year. Also, consider reporting the number added to each “by-name” list each year.

Attention to Race, Ethnicity and Sex.

Concern: Presumably, the plan is not calling for race-based decision making regarding who should receive housing. That would be unconstitutional and violate state and federal anti-discrimination laws. The plan should make an effort to specify what the Council means to accomplish the goal of racial and gender equity in the provision of affordable housing. It should specify how those efforts do not violate anti-discrimination laws. However, if the intent is to promote ethnicity and gender informed response, provide training on how staff might better serve those who may have difficulty accessing services due to gender and ethnic related issues.

Recommendation: Add language encouraging service providers to expand training aimed at helping staff be sensitive to racial, ethnic and gender related issues that may present a barrier to a client's ability to obtain services.

Needs Assessment Data Collection and Methodology

Concern: The Pioneer Park Coalition believes the state should develop a more robust approach to identifying the number and characteristics of people experiencing homelessness. The data gathered during Point-in-Time Count offers only a rough estimate of the number of individuals who are unsheltered. Surveys of people experiencing homelessness are also not sufficiently reliable to identify their true needs.

Working with the Utah Criminal Justice Center (UCJC) at the University of Utah, we have developed a research plan that will use information from HMIS, criminal justice and mental health systems, as well as client surveys by trained professionals, to identify the needs of those experiencing homelessness as well as the flow-patterns of clients through all these systems.

We believe the Utah Homelessness Council should welcome and support an independent study performed by expert researchers who can identify the

client needs and experiences of those served by Utah's homeless services system.

Recommendation: We invite the state council to express their support for the UCJC study which will be funded either through a state appropriation or private donations.