Laura Walker

To:	SARAH OWENS
Cc:	Kristin Retherford
Subject:	RE: AAP Questions

Good Morning Sarah,

Per our conversation, the evaluation of greater participation in a data system (such as HMIS) includes discussions regarding types of data systems and the process of implementing those systems over a wider group of organizations. We're not entirely sure what that will look like, but would like to assist in getting more accurate data. In regards to the PIT numbers, as discussed, this number is from the 2016 Summary Report (this was the only available report this year). Per the process of the counts it does include street outreach, jail counts, and school counts. As I mentioned, I would be happy to include any current information that Jimmy at MWVCAA has in regards to this year's numbers. Unfortunately, the timing of the official PIT counts and the review of the information, typically the final results are not available to us until after our Annual Plan is due to HUD. In regards to the additional questions regarding funding amounts for projects versus the allocation recommendations by the board, the additional funding in the construction projects such as Westcare and SHA include Project Delivery costs. These are city staff costs directly related to the projects funded (e.g. environmental reviews, physical inspections, Davis Bacon oversight/interviews, etc.). The amounts set aside are based on historical costs associated with past projects. "Left over" funds are the additional carry-over dollars listed in the subsequent Annual Action Plan budgets for re-allocation. Thank you for your review and questions.

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From: SARAH OWENS [mailto:HLOWENS2@msn.com]
Sent: Monday, March 27, 2017 9:59 AM
To: Laura Walker <LWalker@cityofsalem.net>
Cc: Kristin Retherford <KRetherford@cityofsalem.net>
Subject: AAP Questions

1) The AAP says (p 9) "The City of Salem in conjunction with the Mid-Willamette Homeless Initiative is evaluating if there could be wider participation in the use of the system across the four jurisdictions of the City of Salem, City of Keizer, Marion County, and Polk County." Where is the City in that process?

2) The AAP says (p 47) "An estimated 1,537 people in Marion and Polk counties are homeless, according to the 2016 Point in Time Count." The 2016 PITC is attached. I read the count as 857. MWVCAA has a habit of juicing the PITC stats it gives out with homeless students, so if that's where the other 680 come from, it shouldn't be reported as being "according to the 2016" PITC. Would you agree? Or am I mistaken in reading the PITC?

From:	SARAH OWENS <HLOWENS2@msn.com>
Sent:	Monday, March 27, 2017 3:28 PM
To:	Laura Walker
Subject:	Another AAP Question

Laura, am I correct in concluding, looking at pages 34 and 35, that the funding amounts should match this year's (recommended) allocations, as reported in the minutes of the 2/22 meeting? I'm trying to understand why

1) The minutes show (for Goal 4) Westcare was allocated $54,535, but the chart on page 34 indicates funding of $74,535.

2) SHA was the only project allocated CDBG funds for Goal 5. The minutes indicate they were allocated $558,040. However, the chart on page 34 indicates funding of $612,740.

3) Based on the figures in the minutes, the remaining HOME funded projects (CCS [CHDO, St. Monica], SHA [sec. dep.], Mt. West, JLM) total $718,200. However, the chart on page 34 indicates funding of $759,970.

Is the discrepancy due to undersubscription (more money that was applied for)? Is there money left over? If it would help for me to come down so you can explain it in person, I'd be happy to do that. I've spent a lot of time trying to figure this out, and I'm just not able to make sense of it.

Maybe you can spot an error in my work here:
https://docs.google.com/spreadsheets/d/1LMNB5A8GewVtygzmp2omywULqseVTrLVlTXykSFl6YY/edit?usp=sharing

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**COMMENT OF SARAH OWENS AND MICHAEL LIVINGSTON ON THE ANNUAL ACTION PLAN
PROPOSED PURSUANT TO 24 CFR 92.220**

This entire document is a single Comment on the the draft 2017 Annual Action Plan (The Plan), prepared for the City of Salem and issued March 15, 2017.

The Annual Action Plan is supposed to provide a yearly update of jurisdictions' proposed community planning and development action steps and priorities for the next program year. This Comment is concerned with the narrative portion of The Plan as it relates to the goal of ending homelessness. Like our Comment on the City of Salem's draft 2016 Annual Action Plan, it is concerned *only with the narrative*, and assumes, without endorsing, the appropriateness of the most recent funding recommendations, the accuracy of The Plan's financial statements, and the correct application of program-specific requirements.

In this year's Plan, the City has attempted to address the concern expressed in our Comment on last year's Plan about the lack of specificity regarding its efforts to coordinate the community response to its housing/homeless problems. This additional information is helpful and necessary to citizens wishing to understand the actions that are being taken on their behalf in this area. But, the question remains whether or not these efforts are sufficient to address the problems in Salem's homeless services delivery system, considering the resources the City has available to it.

For years, the City's approach to its housing/homeless problems has been limited to selecting (with the advice of the Urban Development, Community Services and Housing Commission [CSHC] and its predecessor entities), well established, individual grantees to provide stop-gap solutions to problems, tolerating, if not encouraged, their working separately and in competition, evaluating their performance in isolation, and "working with…key agencies…to better coordinate housing, health, mental health, prevention of homelessness, and social services in the City of Salem" through networking meetings and conventional bureaucratic processes. (Plan at 7.)

This approach had contributed to what Mid-Willamette Homeless Initiative (MWHI) Task Force member and Salem Police Chief Jerry Moore calls Salem's "survival of the fittest" culture. As he puts it, Salem's non-profit homeless service providers "may all be trying to do the same thing, but they're battling each other, and they're not really coordinating amongst themselves." Why? Largely because their funders, including the City of Salem, reward that behavior. They certainly haven't required them to do anything else.

To quote another MWHI Task Force member, Jon Reeves, the Executive Director of the Mid-Willamette Valley Community Action Agency (MWVCAA), which is the City's "lead agency" responsible for coordinating with the "Continuum of Care", the non-profit organizations are not the only ones responsible: "If the government doesn't change its practice, if our local jurisdictions don't come to the table in a different way, we're never going to get anywhere with

this issue [homelessness]."

So what must the City do to "change its practice"? First, the City needs to acknowledge the limitations of its mainstream partner organizations and structures and examine its role in those relationships.

For instance, the "collective goals established through the Mid-Willamette Homeless Initiative strategic plan" likely will *not* "help in providing a more coordinated approach to assisting individuals experiencing homelessness both on the agency level, local government level, and regionally." (Plan at 8.) One has only to read the plan to realize what a disorganized, unstrategic and uncreative mishmash it is. There's not a single area provider, executive or field staff who is excited about the plan's implementation, or thinks the Task Force was anything other than a waste of time and resources. The entire Polk County contingent concluded (on the record) after six meetings that the Task Force was "pointless", and dropped out.

The "Continuum of Care" is an even less reliable partner. According to the Plan, "The Continuum of Care is a community-based long-range planning organization…" (Plan at 8.) But that's just what the Continuum of Care is *supposed* to be. *Salem*'s continuum of care organization -- called the Rural Oregon Continuum of Care (ROCC), or sometimes the "Balance of State" CoC -- is a loose association of 28 mostly rural counties that Salem, Marion and Polk County merged into in 2011. It is staffed by one, part-time, consultant/coordinator who is nominally employed through Community Action Partners of Oregon (CAPO), which exercises no influence over the ROCC's activities. The association is, in a word, dysfunctional, disorganized, and rapidly deteriorating. On a HUD rating scale of 0 to 200, the ROCC consistently scores well below (last year, 117) the weighted average median score earned by other CoCs (last year, 160). Since joining the ROCC in 2011, the Salem area has lost hundreds of thousands of federal homeless assistance program funds, even as its chronically homeless resident population has swelled to more than twice the national average. The Plan's claim that Salem can expect its future consultations with the ROCC to result in " the ability to better leverage funding in the future" is just counterfactual nonsense. (Plan at 23.) Salem's membership in ROCC has only made it *less* able to "leverage funding."

Within the ROCC are seven regions. Salem is in Region 7, along with the rest of Marion and Polk Counties. The Plan refers to Region 7 as "the local CoC." The organization responsible for coordinating "the local CoC" is MWVCAA (see ORS 458.505 *et seq*). Despite this responsibility, MWVCAA, by its own admission, has never managed to extend its coordination efforts with respect to the local CoC beyond their monthly grantee meetings. This is partly due to their tendency to overextend out of an apparent desire for "visibility" in the community, resulting in poorly planned and poorly communicated projects (e.g., Home Base Shelters of Salem and the Warming Centers). Despite being to some extent aware of these problems, MWVCAA remains siloed ("silos within silos", according to its Executive Director), unable to bring about any real or lasting impact, and just as much a participant in the local "survival of the fittest" culture as any other local organization. They can't even be relied on to provide the City with accurate PIT

Count data.[1]

So, if networking meetings and conventional bureaucratic processes will not transform these organizations and the culture that supports them, if implementing the strategic plan developed by the MWHI Task Force is doomed because of the flaws in the plan and the resulting lack of buy-in, and if a continuing association with the ROCC will only dilute Salem's successes and weaken its efforts, what should the City be doing differently? We have three suggestions.

For years, the Plan has claimed that "City of Salem City staff has been meeting with key community leaders to implement a "'Housing First' model that would mirror the prevalent permanent supportive housing best practices approach. This includes: Resource mapping to identify all community resources currently flowing into the housing and social service delivery system; leveraging Section 8 vouchers, SHA resources, local and federal funds in a comprehensive way to provide maximum benefit to target populations; changing housing capital resource allocation processes to ensure integrated, outcome-based investment strategies; and creating new programs utilizing existing unrestricted market housing units as the backbone for implementing a 'Housing First' model. This includes creating financial and non-financial incentives to participate." (Plan at 24.) In previous years, there was no real truth to the statement. This year, however, the statement is *partly* true.

This year, the Salem Housing Authority Board of Commissioners gave tacit approval to the proposed Homeless Housing Assistance Program (HRAP), which would, for the first time ever in this community, target resources toward stably housing our chronically homeless residents. This program, which has been called "smart", "bold" and "courageous", would be the community's first, and only, to follow the "Housing First" model. But it must be funded, and not just for the coming fiscal year, if it is to have lasting impact. Salem should make the HRAP part of a strategic and long-term commitment to a systematic approach to homelessness that includes reexamining how Salem allocates funds through its Federal Programs Division, partnering with Marion and Polk Counties to develop a shared coordinated entry system and a coalition of service providers to the homeless that can compete effectively for HUD Continuum of Care Program funds, engaging the support of landlords, property managers and the wider business community, and monitoring outcomes. Even though there is no mention of them in the Plan, efforts to accomplish these objectives are already under way, and the City should get behind them.

The Plan claims that "[t]he City of Salem in conjunction with the Mid-Willamette Homeless Initiative is evaluating if there could be wider participation in the use of [ServicePoint,] the [Homeless Management Information] system [used in Oregon] across the four jurisdictions of the City of Salem, City of Keizer, Marion County, and Polk County." (Plan at 9.) However, it is

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[1] The Plan states, based on information provided by MWVCAA, that the 2016 PIT Count of homeless in Marion and Polk Counties was 1,537, when in fact it was 857. MWVCAA has for years consistently and erroneously included non-PIT Count data in its reported PIT Count totals to the City, and the City has included those totals in its Annual Action Plan. Plan at 47.

not "evaluation" that is required here, but education -- and action. For years now, the City *could* have been and *should* have been promoting wider participation in the use of ServicePoint by giving preference points to programs that use it and requiring its use as a condition of social-services-related funding. Widespread use of a common database is critical to the development of an effective coordinated entry system and to the City's ability to measure/monitor outcomes. Therefore, the City should dispense with further "evaluation", especially with the MWHI, and immediately begin promoting wider participation in ServicePoint in the two-county area.

The work of the MWHI Task Force having been concluded, and with a new Mayor and City Council poised for action, the time is ripe for the City of Salem, in consultation with Polk and Marion Counties, to get serious about creating their own "continuum of care" organization. Therefore, the third thing the City could and should do, together with Polk and Marion Counties, is determine which of the three is best suited to take on the role of "backbone" in a re-formed Salem, Marion and Polk County Continuum of Care. Once that's decided, appropriate staff should be authorized to begin -- in partnership with a coalition of service providers to the homeless -- the planning and preparation needed to fulfill the "backbone" role in a local continuum. The groundwork, like the groundwork for a coordinated entry system and the expansion of ServicePoint, is already under way at the community level. The City of Salem just needs to support these community efforts by convening the affected government entities and facilitating a decision. It's appropriate for the City to take on that role, as the City has the greatest concentration of homeless residents and service providers, and it has the resources. We hope the City will consider all these suggestions with appropriate urgency and ensure appropriate steps are taken as soon as practicable.

Response to Comment of Sarah Owens and Michael Livingston on the Annual Action Plan Proposed Pursuant to 24 CFR 92.220

Comment: "In this year's Plan, the City has attempted to address the concern expressed in our Comment on last year's Plan…The additional information is helpful…"

Response: Thank you for your recognition of inclusion of additional information in the Annual Plan this year.

Comment: "But the question remains whether or not these efforts are sufficient to address the problems in Salem's homeless service delivery system, considering the resources the City has available to it."

Response: The City continues to work towards a more comprehensive approach to ending homelessness. Those efforts include partnerships with organizations providing services and housing to persons experiencing homelessness. The City continues to attend and participate in discussions regarding greater efficiencies and coordinated efforts in addressing the needs of low and moderate income populations in our community.

Comment: "For years, the City's approach to its housing/homeless problems has been limited to selecting (with the advice of the Urban Development, Community Services and Housing Commission…), well established, individual grantees to provide stop-gap solutions to problems, tolerating, if not encouraged, their working separately and in competition, evaluating their performance in isolation, …through networking meetings and conventional bureaucratic processes."

Response: As required by our federal funding sources, the selection of programs and projects with federal entitlement funds (HOME and CDBG) are weighted by their alignment with the Consolidated Plan goals (2015-2019). The goals identified in the Consolidated Plan are based on community input through surveys, outreach, meeting attendance (neighborhood associations, Emergency Housing Network, etc.); organizational input (non-profits, governmental, and for-profits); research of existing plans and efforts; review of community data (e.g. U.S. Census Bureau, City Data, Portland State University, etc.); and others. Although some programs provided funding are designed as crisis intervention programs, not all programs and projects are such. An example of a program in which it is not a "stop-gap" is Salem Interfaith Hospitality's Fresh Start Program. This program provides transitional Tenant Based Rental Assistance (HOME) in conjunction with wrap-around case management services (CDBG) to families experiencing homelessness. The program has seen a 96% success rate in families moving from homelessness to sustainable housing without assistance. In regards to working separately, the City works with agencies to best leverage our resources, connecting organizations and working to best assist our community. An example is hosting a conversation between Polk CDC (Owner Occupied Housing Rehabilitation Program), Mid-Willamette Valley Community Action Agency (Weatherization Program), and the Mid-Willamette Valley Council of Governments (Single Family Rehabilitation Program) in an effort to see how the programs can

work together to provide a more-rounded approach in assisting clients. This also included sharing training programs, in-takes, and over-arching programmatic goals. In regards to competition, grant processes are always competitive, however the City has been working with organizations to best leverage our resources in ways similar to that previously mentioned. This coordination could lead to consolidated grant applications in future cycles. In regards to evaluating performance in isolation, the City is responsible for compliance with our funding sources, however in review of organizations, we also look at audit information, financial capacity, organizational capacity, etc. For housing projects that include multiple sources of funding such as HOME and LIHTC, the City has a partnership agreement with Oregon Housing and Community Services (OHCS) to conduct the file and physical inspections of those projects. The examples listed above are just that, examples. In regards to bureaucratic processes, unfortunately the sources are governmental as well as the administration of the grants and bureaucratic process is unavoidable although we do work towards creative solutions within the requirements.

Comment: So what must the City do to "Change its practice"? First, the City needs to acknowledge the limitations of its mainstream partner organizations and structures and examine its role in those relationships."

Response: The City is aware of limitations within partner organizations and works to partner with organizations in assisting our community within those structures and relationships. As mentioned previously, the City works within constraints of programmatic funding and local government requirements.

Comment: The next comment is in regards to the Mid-Willamette Homeless Initiative, the strategic plan, and the lack of support regarding that plan.

Response: The City was a partner in the Mid-Willamette Homeless Initiative (MWHI) and provided input into the strategic plan. The MWHI and the strategic plan were and are supported by all groups represented by the group including government, non-profit service providers, public safety officials, business owners, housing developers, etc. This support is evident in the make-up of the membership and the comprehensiveness of the plan in addressing many facets of homelessness.

Comment: The following comment is in regards to the Continuum of Care (CoC) and the City's partnership with the Rural Oregon Continuum of Care (ROCC).

Response: The CoC, in this case the ROCC is the administrator for homeless specific grants through the U.S. Department of Housing and Urban Development (HUD). The opinion of the ROCC as "…dysfunctional, disorganized, and rapidly deteriorating," is just that. Additionally, the statement, "Salem's membership in ROCC has only made it less able to 'leverage funding'," is also an opinion. HUD determines CoC funding based on formulas, need, and other assessments. It is unclear as to whether defining a separate CoC from the ROCC would in fact provide more CoC funding sources to the City of Salem. Additionally, with the creation of a stand-alone CoC

comes the responsibility of managing and administering the funding tied to it. There currently is not an identified administrator that would be able to take this on.

Comment: The next comment is in regards to the Housing First model and the City's first community program using this model.

Response: The comment connects the Housing First model explicitly to the chronically homeless. The Housing First model is not explicitly for the chronically homeless, it is for all persons experiencing homelessness. "Housing First is a homeless assistance approach that prioritizes providing people experiencing homelessness with permanent housing as quickly as possible-and then providing voluntary supportive services as needed." (National Alliance to End Homelessness) http://www.endhomelessness.org/pages/housing_first As mentioned in a previous response, programs like SIHN's Fresh Start Program also exhibit the housing first model. Other projects, such as Shelly's House fit this same model as well. Additionally, the City is supportive and will continue to be supportive of programs addressing homelessness and the coordination of these programs.

Comment: The following comment is regarding use of a data collection system imposed through funding allocations by the City.

Response: The City in conjunction with the MWHI is evaluating which system to implement regionally to ensure comprehensive data collection across the region. Although the Homeless Management Information System (HMIS) is an example of such a tool, the City will be working with the organizations that will be using the system to ensure that this is the most comprehensive and supported system to implement. The City supports further use of data systems as mentioned.

Comment: The final comment is in regards to the City being the administrator of a separate CoC.

Response: As mentioned previously, the City would need to evaluate the ability, reasonableness, and requirements of becoming its own CoC. A decision to become its own CoC must require a full evaluation of what that would mean in respects to administrative requirements, capacity, etc.

Your comments are much appreciated. Thank you for reviewing the City of Salem's 2017-2018 Annual Action Plan and providing feedback.