

COMMENT OF SARAH OWENS ON THE ANNUAL ACTION PLAN PROPOSED

PURSUANT TO 24 CFR 92.220

This entire document is a single Comment on the the draft 2018 Annual Action Plan (The Plan), prepared for the City of Salem and issued March 21, 2018.

A word about process. I am a member of the Urban Development, Community Services and Housing Commission (CSHC). Given that The Plan was on the April CSHC agenda as an action item, I assumed I would be allowed to ask questions and offer comment on The Plan during the meeting. However, when I attempted to do so, I was told I would need to submit questions and comment in writing. Members were not informed prior to the meeting that they would need to submit questions and comment in writing. After a discussion, the acting Chair allowed me to ask questions. Then, Member Downing moved to “accept” The Plan (but not the Amendment) *with* the clarifications indicated by my questions. The motion passed unanimously with five votes, whereupon staff informed Member Downing and another member that they were not permitted to vote due to the fact that they had each declared a conflict of interest, as The Plan allocates funds to their programs. This comment is submitted in compliance with the instructions of City staff.

As I observed at the CSHC meeting, the 2018 Plan seems generally to be an improvement over the 2016 and 2017 Plans. The narrative contains fewer generalizations and more specifics, such that the the average citizen can understand and find out more about what the City is actually doing in support of its stated CDBG and HOME Program goals. Including “CDBG and HOME Program” in the title was a needed and welcome clarification, as was the Amendment.

Some sections are still in need of clarification.

The Amendment: it’s not clear how the total to be reallocated (\$937,016) squares with the total prior year resources (\$946,208) listed in Table 3 on page 28 of The Plan. Staff was unable to explain the relationship between the Amendment and Table 3, if any, at the April CSHC meeting.

AP-05 1.

services. For program year 2018, a total of approximately \$1.2 million is governed by this annual plan. The 2018 funds are combined with the reallocation of resources from 2014, 2015, 2016 and 2017 federal grants to address community development, economic and housing conditions in Oregon’s capital city.

The first sentence (beginning “For program year 2018”) is poorly worded and not accurate, as The Plan “governs” “a total” of more than \$1.2 million.

AP-10 1.

“APP” should be AAP

Staff is working with a number of community-driven efforts to enhance coordination between housing, health (mental and physical), and social services in the City of Salem. The coordination of efforts will reduce silos and duplication of services.

“Community-driven efforts” should be specified (or reference made to the other part of the Plan that specifies them, if any).

Emergency Housing Network (EHN), Mid-Willamette Valley Health and Housing Collaboration, and the North Salem Service Integration Team (SIT). Additionally, the City of Salem has “(SIT)” should be omitted (as it’s not referenced again) or changed to “(North Salem SIT)” as there are many different teams in Marion, Polk and Yamhill Counties.

The Mid-Willamette Valley Community Action Agency (MWVCAA) coordinates the local Continuum of Care efforts as a part of the Rural Oregon Continuum of Care (ROCC). The ROCC serves 28 counties including Marion and Polk, inclusive of the cities of Salem and Keizer. The City of Salem participated in the annual assessment.

“Local Continuum of Care efforts” should be clarified here and on page 13 by offering examples of the activities that MWVCAA coordinates, like reporting to HUD, the Housing Inventory Count and the Point in Time Count. It is also not clear what “the annual assessment” refers to. If it refers to the Point in Time Count, the text should be amended to read “participated in the annual Point in Time Count.”

PRELIMINARY numbers from the homeless surveys collected on January 31, 2018 are provided below:

- Marion County Unsheltered - 455
- Polk County Unsheltered - 174
- Total Marion & Polk surveyed - 629

On April 9, CRP Director Jimmy Jones reported to the Health & Housing Committee (referred to in The Plan as the Mid-Willamette Valley Health and Housing Collaboration) that the total number of unsheltered individuals counted in the 2018 Point in Time Count in Marion and Polk Counties was 618.

This represents a significant increase from the previous year. It is a snapshot of one day. The table below demonstrates that the number of persons needing and receiving assistance will require a comprehensive approach that must include the public and private sector.

With regard to the first sentence, it should be borne in mind that the 2017 Plan reported only that 298 school children were counted in the 2016 Point in Time Count. It did not report the

2016 totals, or the preliminary 2017 Point in Time Count results. Accordingly, instead of “significant increase”, the narrative should clarify that the total number of unsheltered individuals surveyed in Marion and Polk Counties in 2017 was 352 and that a primary reason for the increase in 2018 was increased community involvement. (See here <http://www.oregon.gov/ohcs/Pages/research-point-in-time-homeless-count-in-oregon.aspx> and here http://www.mycommunityaction.org/CRP/housing_homeless_information.html)

The last sentence (beginning “The table below demonstrates”) is questionable (as it’s not clear what the table demonstrates) and not really necessary.

As of March 2018, ARCHES reports:

Active Homeless Waitlist:

- ▶ 1,529 Households on Active Waitlist
- ▶ 2,392 Clients on Active Waitlist

Active Prevention Waitlist:

- ▶ 316 Households on Prevention Waitlist
- ▶ 664 Clients on Prevention Waitlist

It is unclear what these “waitlists” are; how they are ordered and maintained, who is eligible to get on them, what programs accept referrals from them, what services are provided as a result of a referral, whether there is any follow up, average wait times, etc. Staff was unable to offer any information about the waitlists, other than they’re maintained by ARCHES and those on the waitlist have been “assessed.” The figures are set out in the text as if they are important, but it’s not clear why.

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MWVCAA ARCHES Project (7/1/2017) - (3/1/2018)

Program	Households Served	Households Searching	Households Housed	Intakes Scheduled	Total Unique Served
HOME TBA RRH/Prevention	45	20	23	2	56
HUD ARCHES RRH	60	10	51	6	129
DHS Fresh Start RRH	33	7	10	5	113
Tenant Education/Housing Case Mgmt	42	0	1	15	67
SSVF RRH	48	0	33	4	78
OHA-VRAP RRH	35	4	31	10	56
ERA	9	1	8	3	12
ESG / Housing Assistance Program	22	10	14	6	30
VET DRF / Lottery Vets	15	0	11	2	38
HSP	7	0	7	2	27
Cascade Housing Project RRH	15	15	4	10	38
Cascade Housing Project Prevention	22	1	22	10	56
Polk County RC Prevention	29	0	0	0	88
Polk County RC RRH - Diversion	17	0	17	0	34
Marion County Prevention	6	0	0	0	20
Marion County Holiday Project	130	0	0	0	566
City of Salem HRAP	121	41	32	5	121
Totals	656	109	264	80	1529
	Households	Adults /		Clients	Total Unique

What is the reader to understand from this chart? What do "served", "searching" and "housed" mean? Are waitlist assessments considered a service? Are "intakes" considered a service? Are "searching" households enrolled in a program? What about exit data? Is there any overlap between the categories? (Are "intakes scheduled" hhs included in "served", "searching" or "housed"?) Does "total unique served" refer to individuals or hhs? A key of some sort is needed if this chart is to be included.

We will continue to work with the ROCC and other partners in developing strategies to address the needs of unsheltered persons.

Clarify that "we" here means the City (aside from page 4, this is the only place The Plan uses "we" to refer to the City).

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

Vento resources for the City. The MWVCAA, as a member of the Rural Oregon Continuum of Care (ROCC), also coordinates the local CoC effort for Marion and Polk counties through the Marion and Polk Counties Plan to End Homelessness. The Marion and Polk Counties Plan to End Homelessness is a community based long-range plan addressing the needs of homeless persons in order to help them reach maximum self-sufficiency. MWVCAA, Shangri-La, SHA, St. Francis, St. Josephs, HOAP, and HOME Youth Resources are using the Homeless Management Information System (HMIS). The City is exploring best practices to meaningfully engage in the CoC collaborative and receive regular aggregate data reports from OHCS or ROCC.

The text is not particularly responsive to the question, which asks for a description of the City's "consultation in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, develop funding, policies and procedures" for HMIS administration. The first sentence (beginning "The MWVCAA") is a vestige of earlier Plan language. MWVCAA has not been responsible to "coordinate[] the local CoC effort for Marion and Polk Counties through the...[10-Year] Plan to End Homelessness" since 2011, the last year Marion and Polk Counties had their own, independent, CoC.

The 10-Year Plan to End Homelessness will be ten years old this October. As was confirmed at the April CSHC meeting, it has not been mentioned in the provider community in the past year. The Mid-Willamette Homeless Initiative Task Force had the 10-Year Plan in its resource documents, and purportedly sought to "put meat on the bones" of the 10-Year Plan, but the Task Force was disbanded in February 2017. As was discussed at the April CSHC meeting, the 10-Year Plan was never implemented in large part because it was completed just as The Great Recession hit. It might be the plan of record for Marion and Polk Counties, but it's not actually been used by *anyone* to coordinate *anything*, and it is misleading for The Plan to suggest it has.

About the second to last sentence (beginning "MWVCAA, Shangri-La..."), HOME YRC is a program of MWVCAA, and shouldn't be listed separately (or all MWVCAA programs using ServicePoint should be listed). Salem Housing Authority does not use ServicePoint except for its Homeless Rental Assistance Program, so HRAP, not SHA, should be listed. Family Promise (formerly Salem Interfaith Hospitality Network) should have been using ServicePoint during FY 2017 for some clients, and so should be listed.

About the last sentence, examples of "best practices" that are being explored are needed to clarify what the City is doing "meaningfully engage" and "receive...reports." As to the latter, MWVCAA is responsible for coordinating regular reports to OHCS and HUD, and is in a position to share those reports with whomever they choose. OHCS does not publish the data it receives, and the data reported to HUD is aggregated with the data from the other 26 ROCC counties, and so is not useful for local planning purposes. However, during the April CSHC meeting, staff said that MWVCAA had assured her she "can get anything" in the way of data that's needed.

AP-10 2.

“COS” should be “City of Salem” (pages 18 and 26)

Housing Needs Assessment (HNA)	City of Salem	The HNA validates information collected during the Consolidated Plan process. The goal of more “aging in place” housing and the increase in job training and job creation programs and projects over the next five years is a shared goal. The HNA indicates the need for an additional 6,400 housing units over the next 20 years.
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The sentence, “The HNA indicates the need for an additional 6,400 housing units over the next 20 years” is not quite accurate. The 2015-2019 Con Plan quotes the Preliminary Draft HNA as finding a deficit of 6,400 housing units *for households earning less than \$25K/yr*, based on data that is by now pretty old. The sentence would be less misleading if it were in the past tense and the phrase “over the next 20 years” was omitted (“indicated the need for an additional housing units for households earning less than \$25K/year.”)

Mid-Willamette Homeless Initiative	City of Salem, Marion County, City of Keizer, and Polk County	The Mid-Willamette Homeless Initiative Strategic Plan contains a shared vision with a regional approach. As the City of Salem was actively engaged in the Initiative, the City will work
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Instead of listing Polk County (which pointedly chose not to participate in the implementation phase), the Cities of Monmouth and Independence should be listed as lead organizations, since they contributed financially to the implementation effort, and their managers sit on the policy/steering committee.

AP-15

Table 3: it’s not clear how the Amendment’s total to be reallocated (\$937,016) squares with the total prior year resources (\$946,208) listed in Table 3. Staff was unable to explain the relationship between the Amendment and Table 3, if any, at the April CSHC meeting.

Discussion (optional)

SHA administers nearly 3,000 Housing Choice Vouchers. SHA continues to administer 63 Department of Veteran Affairs Supportive Housing (VASH) vouchers as well as the 125 Family Unification Program vouchers through a combination of those from June 2011, 19 from an older program, and 6 through a program with the Department of Human Services (DHS). Additionally, SHA administers five homeless vouchers and three domestic violence vouchers. All funding allocations and amounts are based on estimates until final

This section contains incorrect information. At the April CSHC meeting, staff confirmed that Salem Housing Authority staff had provided corrections to this section.

AP-20

3	Expand Affordable Housing	2015	2019	Affordable Housing	Salem Citywide	Affordable Housing Rehabilitation	CDBG: \$400,000 HOME: \$975,530	Rental units rehabilitated: Household Housing Unit Rental Units Constructed: Household Housing Unit
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The CSHC allocated CDBG and HOME funds totalling \$2,680,540. The total of the figures in Table 4 come up \$175,000 short. The total CDBG in row 3 should be \$575,000, not \$400,000. The same mistake appears to have been made in Table 7.

AP-35

Should HOME and/or CDBG revenues (either annual allocation or program income) exceed or diminish from the planned amount, the additional resources shall be allocated in accordance with these funding guidelines.

- All proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

These two sentence are confusing and need to be reworded (e.g., "Should...revenues...vary from the planned amount, the increase or decrease will be shared proportionately across all projects").

AP-38

The CSHC allocated CDBG and HOME funds totalling \$2,680,540. The total CDBG in row 3 should be \$575,000, not \$400,000.

AP-65

Mid-Willamette Valley Family Promise (formerly Salem Interfaith Hospitality Network), a non-profit serving circumstantial homeless families, is dedicated to moving families with children from homelessness to lasting self-sufficiency. Affiliated with the national network of the same name, Family Promise advances a highly effective, sustainable and expandable service delivery drawing on resources of the faith community, churches, synagogues, mosques, and temples. The three main components of the program are outreach and screening, transitional housing, and extensive counseling and case management.

This program description stands out as having a very different tone from the other descriptions in this section, which sound factual and objective. All homelessness could be considered "circumstantial", and all programs could be said to be "dedicated" to moving their clients to "lasting self-sufficiency." So, unless the City knows for a fact that this program "advances a highly effective, sustainable and expandable service delivery", that language should be omitted.

The City supports a number of programs to assist low-income individuals and families to avoid homelessness, including providing Section 8 Housing Choice Vouchers to homeless people,

This section should describe primarily what the City is doing to help homeless individuals “make the transition to permanent housing” (the *next* question asks about programs helping low-income individuals and families “avoid” homelessness). The text should include examples of the programs designed to help homeless people “make the transition” (e.g., HRAP). NWHS Crisis & Info Hotline should be listed as an example of a program designed to help low-income individuals and families “avoid” homelessness.

Discussion (optional)

As described above, the City will be continuing the effort to prevent and eliminate homelessness. The issue of homelessness will be addressed through multiple programs with a focus on preventing homelessness.

The first sentence doesn’t add anything, and the second sentence is questionable -- why is the City saying the issue will be addressed through programs focused on *preventing* homelessness? Some programs the City has funded are, but most aren’t. The Con Plan and the City’s recent Strategic Plan refer consistently to preventing *and* ending/eliminating homelessness together -- so if this language is not just a vestige from a previous plan, and the City intends to “focus” on preventing homelessness, it should explain where that focus came from.

AP-75

Building housing that is affordable to households of all income levels and appropriate for special needs populations face many challenges. While the current shortage of affordable housing is primarily due to construction costs, the City is working to reduce governmental regulations that pose constraints to the production and preservation of affordable housing. Affordable housing and addressing homelessness are priorities of Salem’s citizenry and elected official.

Building houses...“face many challenges” (alternatively, “Efforts to build...face many challenges”) and “elected officials”

- Providing property tax exemption for non-profit operating low-income housing.
- Researching best practices that allow additional incentives to developers who provide affordable housing.
- Advocating and educating Federal and State partners about affordable housing needs in

“Non-profits” and “Advocating *for*.”

Coordination between public and private housing and social services agencies is an extremely important activity. The City participates in the meetings of our local CoC collaborative, which is comprised of various housing and social service agencies. The collaboration of many local stakeholders provides better service to the underserved through many different projects and programs. Collaborating with these institutions is vital to overcoming any gaps in institutional structure, and will continue in the next plan year.

This paragraph and the next two paragraphs are carryovers from prior AAPs and are too general to be informative. The “meetings of the local CoC collaborative” should be specified, as it’s not clear what “local CoC collaborative” refers to.

There are two references to the Salem Interfaith Hospitality Network (pages 49 and 56) that need to include its recent name change.