

Philip Mangano, Director
The United States Interagency Council on Homelessness
451 7th St. SW, Suite 2100
Washington, D.C. 20410

Dear Mr. Mangano:

We are writing to express our concerns about the Administration's "chronic homelessness" initiative, and to ask for your support for measures to end homelessness for all Americans.

First, the "chronic homelessness" initiative does not address the reality of homelessness in our states and communities. We have witnessed growth in the scale and severity of homelessness among families with children, unaccompanied youth, and other populations who do not fit neatly into the "chronic homeless" paradigm. Yet current federal mandates are forcing our communities to overlook these gaps and needs in favor of a narrowly-constructed national priority. Non-disabled populations in our communities face service gaps that, if left unaddressed, have the potential to cause irreparable harm. For example, children who experience homelessness are at a much higher risk of developing disabilities, suffer from increased rates of illness, and encounter numerous academic difficulties. By ignoring their plight now, under the questionable assumption that families move through homelessness more quickly and are therefore unaffected, the Administration is all but guaranteeing the perpetuation of "chronic" homelessness into the foreseeable future.

We are also concerned that the "chronic homelessness" initiative, as currently envisioned, fails to end homelessness even for those individuals who fit the initiative's priorities. While supportive housing is a critical component of ending homelessness for many individuals with disabilities, by itself it cannot prevent people with disabilities from becoming homeless. Similarly, "discharge planning" is a laudable goal, but when no affordable housing exists to which people can be discharged, it becomes merely an exercise in problem management. Only a sustained effort to address the systemic causes of homelessness, including lack of adequate health care, affordable housing, and livable incomes, will prevent and end homelessness for people with and without disabilities. This is perhaps the most perplexing aspect of the "chronic homelessness" initiative: the complete absence of any discussion of poverty. To separate homelessness from poverty is to fundamentally distort its causes -- which is precisely what the chronic homelessness dialogue appears to have accomplished.

Finally, we are troubled by the Administration's reliance on a single research focus to formulate federal homeless policy.¹ While this research is certainly informative, it is limited by its focus on publicly-funded, centrally-administered shelters and major

¹ Culhane, D.P. & Kuhn, R. (1997). Patterns and determinants of shelter utilization among single homeless adults in New York City and Philadelphia: A longitudinal analysis of homelessness. *Journal of Policy Analysis and Management*, 17 (1) 23-43.

metropolitan areas. Federal policy should not be based on research that excludes the data and experiences of suburban, rural, and smaller metropolitan areas, as well as less traditional arenas of service delivery (public schools, motels, community action agencies, etc). Nor should definitive conclusions be drawn from this research -- namely, that targeting resources toward a population that "uses up" a greater percentage of federal resources will "free up" more for other populations. In the absence of any meaningful expansion of resources, or in the absence of consideration of research that examines the impact of homelessness on the populations assumed to be unharmed by their relatively shorter shelter stays, such a conclusion is unwarranted. In sum, we request that the Administration look more carefully at existing research that is inclusive of all geographic areas and populations.

In response to our concerns, we are asking for the Administration's support for measures to end homelessness *for everyone*. Legislation such as the National Housing Trust Fund and the Bringing America Home Act are based on the experiences of front line providers and advocates, diverse geographic areas, and wide-ranging service experiences. By addressing the causes of homelessness -- not merely its symptoms -- they offer real promise for abolishing homelessness from our nation's history. We urge your support and request a response.

National Association for the Advancement of Colored People
National Association for the Education of Homeless Children and Youth
National Center on Family Homelessness
National Coalition Against Domestic Violence
National Coalition for the Homeless
National Coalition for Homeless Veterans
National Human Services Data Consortium
National Law Center on Homelessness & Poverty
National Organization for Women
National Student Campaign Against Hunger & Homelessness
Volunteers of America
Colorado Coalition for the Homeless
Illinois Coalition to End Homelessness
Iowa Coalition for Housing and the Homeless
Florida Coalition for the Homeless
Massachusetts Coalition for the Homeless
Minnesota Coalition for the Homeless
Chicago Coalition for the Homeless
Coalition on Homelessness, San Francisco
Broward Coalition for the Homeless
Greater Cincinnati Coalition for the Homeless
People's Emergency Center of Philadelphia
Metro Atlanta Task Force for the Homeless
Missouri Association for Social Welfare
Northeast Ohio Coalition for the Homeless
Northern Kentucky Housing & Homeless Coalition
Upstate Homeless Coalition of South Carolina