May 20, 2022

Members of the California Interagency Council on Homelessness
Coastal Hearing Room, CalEPA
1001 I Street
Sacramento, CA 95814

Dear Secretary Castro Ramirez, Secretary Ghaly, and Council Members,

Regrettably, I had committed to a study session in Copenhagen, Denmark addressing housing and economic development before being appointed to the Council, so I am unable to join you in person on May 31st. I look forward to our work together to help realize the vision in which homelessness in California becomes a rare, brief, and non-recurring experience. Respectfully, I submit the following comments and observations concerning the Action Plan for Preventing and Ending Homelessness in CA.

I thank you and the Cal-ICH staff for the thought, deliberation, and effort that is clear in the plan and the desire to drive meaningful and measurable progress to eliminate the crisis of homelessness on our streets. When last counted, more than 160,000 California residents were homeless, accounting for more than 25% of people experiencing homelessness in the United States. We can and must do everything in our power to change that fact. We can and must challenge the flawed notion that homelessness is the result of poor personal decisions and acknowledge that it is rooted in systemic racism, generational poverty, and unjust housing policy decisions made for more than a century. And, most importantly, we can and must fight against the tendency to look away, to become numb or complacent, to somehow normalize or accept as a given the suffering that is visible on our streets, sidewalks, empty lots, freeway on-ramps, in the faces of people struggling to survive without a roof over their heads. It is simply unacceptable. Together, as leaders of our state’s systems to respond to homelessness, we must find a way to innovate, make the hard changes, and adequately fund our system of care to provide all that is needed when it is needed.

Every State agency has a role to play in this effort. Each agency must take an inward look at how current processes and practices are either helping or hindering widespread system coordination, creating eligibility or barriers to access, preventing the best use or maximum impact of state funds when they reach the local level. Each State agency also has a workforce role to play and should be
looking for ways to partner with community-based organizations that are helping work-ready individuals who are on a path from homelessness or low-wage employment to economic mobility and security.

I commend the Plan’s emphasis on strengthening racial equity-focused responses, strategies, and activities of State agencies, and of local agencies and organizations. While documenting and making racial disparity data publicly available is a necessary and tangible first step, we must go beyond that to hold ourselves and local agencies accountable for concrete plans to reduce racial disparities among those experiencing homelessness in our communities.

The U.S. Census shows about 6.5% of Californians identify as Black or African American, but they account for nearly 40% of the state’s homeless population, and in parts of California, Native Americans are overrepresented among people experiencing homelessness by 4-15x compared to the general population. We need strong incentives to reduce racial disparities, metrics and timelines for those reductions, and to tie those performance measures to future funding opportunities, because the status quo is unacceptable. We must also gain a more comprehensive, statewide understanding of racial disparities in returns to homelessness among people who are initially housed or helped in some other way by our emergency response system.

**Action Area 1, Objective 2** speaks to centering the State and local planning processes on guidance and recommendations from people with lived experience. While the Plan’s suggested activities in this area are a good initial step, voices of people with lived experience should be integrated directly into the Council’s work and its expectations for the local planning processes, not in a way that just seeks comment, but with a full seat at the decision-making tables.

The Plan places a high priority on coordination, regional and interjurisdictional planning. There is very little of that actually happening in our communities. Cities and counties barely have the bandwidth to respond to the day-to-day emergency situations they face, let alone staff capacity to look beyond their boundaries for opportunities to work across city and county lines. Furthermore, the funding structures that we currently have do not lend themselves to creativity and combining funding sources. We see some examples of cities within counties and with their counties taking this step with respect to strategies or facilities that will serve multiple cities. A better approach is to create funding structures that are designed from the beginning to support regional planning and consensus regional solutions, similar to the Community Economic Resilience Fund model. We must find a way to align and truly coordinate our housing, health, behavioral health, and workforce systems to create pathways to housing and economic security for people currently experiencing homelessness, as well as households in the extremely low-income category who are at high risk.
**Action Area 1, Objective 6** prioritizes the creation of data-informed education and communications for both local partners and the public. Broad scale narrative change is important for people to have a better informed understanding of the drivers of homelessness. There is a high degree of community concern about homelessness and the lack of housing affordability, but not a clear connection to what the State’s investments are and how those investments are being used, which contributes to a further erosion in public confidence that government is capable of successfully solving the issues that are impacting people experiencing homelessness, or the ripple effect that homelessness has in a community. There are powerful efforts underway across the state to shift the narrative that we should learn from and align with as we do our own outreach and education.

**Action Areas 2 and 3** call for the State to equitably address the health, safety, and service needs of those who are living outdoors and for expanding the capacity of communities to offer effective emergency shelter and interim housing. Unfortunately, seeing people live under freeways and in make-shift dwellings on our streets has been normalized. While embracing the importance of housing being the answer to homelessness, which it is, many communities and the State, have let sidewalks and empty lots become the waiting place for a permanent home. People who need access to deeply affordable or supportive housing that takes too long to build in a system that doesn't have the resources to provide it at anywhere near the scale that is required are left to languish in public space. As the plan suggests, CalAIM presents new opportunities, but these are early days. It will be important that we move as quickly as possible from Managed Care Plans (MCP) opting-in to Community Supports to ensuring that robust and equitable services are offered by every MCP to unsheltered individuals, and not just as short term or one-time housing stabilization support. Project Roomkey showed that local communities can mobilize rapidly to help people move indoors when COVID-19 necessitated it and Project Homekey has helped make more units permanent in a short period of time than at any time in recent memory.

**Finally, the State Funding and Programs Working Group, and this Council, must double-down on homelessness prevention.** The combination of eviction protections and financial assistance to help pay rent for tenants who fell behind during the pandemic, helped millions of California residents to remain in their homes. Without it our State would be much worse off than the already challenging situation we are in. With the U.S. Treasury support for rental assistance depleted, the State and local agencies have been forced to fill the gap, but most of these measures are temporary. We know that pandemic health and economic impacts, as well as the ability to recover from them, were uneven and fell more heavily on Black and Brown households. We also know that prevention is one of the most cost-effective and least trauma-inducing strategies we can employ to reduce homelessness. Our Plan must emphasize research-based methods and prioritization, but most importantly, ensure
that Californians have access to a robust continuum of prevention services that includes an understanding of and adequate funding for all of the following: anti-eviction services, homelessness prevention, diversion, and rapid exit from homelessness. To a person who is about to be removed from their home, the program definition is less important than having access to the help they need when they need it.

I look forward to learning more about your perspectives on these issues and working with you and our local governments to chart a new path to the day when California can be proud to say that every resident has access to the basic necessities—including health, housing, and safety—to prosper and thrive in our state.

In partnership,

Tomiquia Moss
Founder and CEO
All Home