

Recommendations from the Public

Recommendations were organized into overarching categories. Within those categories, each recommendation is provided. Considerations after each recommendation are included; the considerations reflect the discussion or perspective of TDHCA staff, the TICH Veteran Workgroup, and TICH members.

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1: INCREASE PARTNERSHIP WITH THE RENTAL MARKET

Education

Landlords and property managers need to be educated on resources available to assist them in housing Veterans with housing barriers.

1a. Education of Landlords/Property Managers

Recommendations from the public included educating landlords on the many tools and services available to Veterans and within a community that can allay concerns related to perceived risks associated with renting to hard-to-house Veterans, such as Veterans with criminal records, history of substance abuse, mental health issues, or evictions. In order to help the private market gain confidence in handling some of the challenges that can arise when renting to hard-to-house Veterans, landlords and property managers could benefit from education.

Considerations: The recommendation above, if operationalized, would need additional parameters, such as the specific targeted audience for the education (local Veterans and local property managers, for instance) and how the education would be delivered.

Education could include peer-to-peer learning and subject matter experts on hard-to-house Veterans. For example, landlords or property managers that have rented to hard-to-house Veterans could provide education from their experience. In addition, Veterans who had been hard to house could provide awareness of their experience of the barriers to finding housing and how they overcame those barriers.

In developing education materials, resources such as 2-1-1 Texas Information and Referral Service could be included. Staff members operating 2-1-1 are trained for crisis situations, and educating landlords/property managers to call 2-1-1 instead of 9-1-1 may stop some issues from escalating.

In addition, Veterans searching for housing may also need education on what landlords require and strategies for addressing their barriers for housing. For example, if Veterans learn that lack of documentation of income is a barrier to housing, Veterans can take steps to address the documentation of income. Likewise, if Veterans have outstanding utility debt that is a barrier to housing, Veterans or assistance organizations may focus on repaying the utility debts.

Create incentive for landlords to work with hard-to-house Veterans

Incentives could address several barriers: First, in communities where there is limited rental housing stock, incentives could help encourage private properties to assist veteran clients. Second, incentives could be used to promote the establishment of local relationships between caseworkers and landlords to house Veterans needing rental assistance who may not qualify for a traditional lease because of barriers to housing such as criminal records, evictions, or other barriers to housing.

1b. Offer landlords/property managers one point of contact

Recommendations from the public included that landlords/property managers be provided one single point of contact for any issues that arise while working with Veterans receiving

housing assistance. This would bring a level of security and simplicity to the landlord/property manager.

Considerations: Case managers may already be available through a variety of funding sources, such as Continuum of Care (“CoC”) member organizations, Emergency Solutions Grants (“ESG”) Subrecipients, Supportive Services for Veteran Families (“SSVF”) providers, or U.S. Housing and Urban Development (“HUD”)-Veteran Affairs Supportive Housing (“VASH”) voucher providers.

Greater coordination and communication could be achieved between the case managers and the landlords/property managers if a single case manager was assigned as a point of contact either for a specific Veteran or for a specific property. The person providing assistance to the Veteran that initially reaches out to landlords/property managers could be the same as the point-of-contact for any other issues that arise. If one point-of-contact is not available for each landlord/property manager, the local apartment associations could be a good resource to have a point-of-contact for its members.

It should be emphasized that the Veteran tenant using a single point of contact would not be a requirement for receiving rental assistance; the Veteran should have a choice to utilize such a point-of-contact or not. Public input noted that Veterans should not be required to allow a property access to their caseworker as a condition of tenancy.

The concept of a single point-of-contact for landlords is used in the Section 811 Project Based Rental Assistance Demonstration Program. Each property in the Section 811 Program has a point of contact at the Health and Human Services Commission (“HHSC”) that they can reach out to if they have questions or issues arise with an 811 tenant. Once the point-of-contact communicates with the landlord to identify the issue, the point-of-contact then reaches out to work with the 811 tenant’s caseworker. The property does not become privy to information that the 811 tenant may not want shared. The creation of a similar type of single point of contact for Veterans receiving housing assistance could serve to assist the veterans and caseworkers in resolving challenges and reduce the likelihood of landlord eviction.

1c. Financial assistance for any damages and incentive payments

Recommendations from the public via the round tables included the concept of a financial guarantee in which a landlord is assured of financial assistance for damages in excess of what the security deposit is able to cover. For example, a source of funds would be made available to the landlord for any damages to the property caused by the tenant. Another way to guarantee financial assistance could be that the Veteran, landlord/property manager, and service/housing provider enter into a three-way contract, such as a surety bond. With a surety bond, the Veteran tenant (principal) agrees that they will perform the “obligation,” such as maintaining their unit; the landlord/property manager (obligee) gets the assurance of coverage; and the service/program provider, as the surety, assures the tenant will perform the obligation. If the Veteran damages the property, the service/housing provider is responsible for the damages. One suggestion from the online forum was to have a private sector capital campaign to raise funds for guaranteed financial assistance.

Recommendations from the public also included offering an incentive payment to be made to the landlord, for instance, a simple cash incentive, for landlords that would be willing to house Veterans with barriers, such as evictions, criminal records, etc. Another example was that the cash incentive is tied to a time criteria, such as an incentive payment equal to one month's rent if the Veteran remains in the unit for six months to one year.

Considerations: Certain cities already have a fund of private donations used to reimburse landlords/property managers for any damages caused by the tenant who is a Veteran. While risk mitigation may be needed with Veterans with barriers to housing, the risk mitigation could only be offered on a case-by-case basis for the Veterans with the highest barriers to housing in order to conserve funding. Veteran County Service Officers may be able to identify Veterans that would most appropriately benefit from the service.

Regarding the incentive payments for the landlords, the TICH wanted to make a counterpoint to this suggestion that the property is already being benefitted from having a rented unit. Many landlords may not need another incentive to house Veterans, especially if the Veteran is being housed with a program that provides guaranteed rental assistance payments. Because of this, the TICH suggested that financial assistance should be limited to a certain amount, such as \$500 or \$1,000.

The incentive payments to landlords could have potential negative consequences. One possible negative consequence is that a Veteran may be pressured to stay in a unit which he/she does not need or want in order for the landlord/property manager to receive the incentive payment. The Veteran may obtain a job in another area and need to move, in which case the landlord is not at fault for the Veteran vacating the unit, but the landlord would not receive the incentive payment.

In addition, if a landlord/property manager received incentive payments without a time period associated, the landlord/property manager could offer units, accept the incentive payment and then promptly evict the assisted Veteran. Furthermore, the program would have to be carefully designed to ensure that landlords/property managers do not receive incentive payments but ultimately do not house Veterans. The possibility of providing incentives at the time of lease renewals may be more appropriate in order to increase housing stability of the Veterans.

Several positive aspects of this recommendation are that the program could be targeted specifically to benefit Veterans experiencing homelessness (as opposed to the general Veteran population), and it could be relatively simple to implement within existing rental assistance programs.

Rental Application Changes

The State should issue guidance or regulations on what can and cannot be considered as criteria to deny a rental application.

1d. Criminal history background check should be limited to five or ten years.

Recommendations from the public included that the State should provide guidance that rental applications should not request criminal history for more than five or ten years. Veterans with

a criminal history of more than five or ten years may be disqualified for housing without consideration of any reform or rehabilitation since the original offence. A comment from the online forum was that the State should provide guidance on reasonable “look-back” periods, which would take into consideration the nature of the applicant’s offense, the age at which the offense was committed, and other factors shown by data to influence an applicant’s chances of recidivating. In addition, a recommendation was made that the State should provide guidance on granting reasonable accommodation during the application process.

Considerations: Guidance from the U.S. Department of Housing and Urban Development (“HUD”) was released for providers or operators of housing and real-estate related transactions on April 4, 2016, after the Roundtables on Veteran Homelessness were held. The HUD guidance states that criminal background should be considered on a case-by-case basis, and that a blanket policy of denying persons because of criminal records was discriminatory.

The TICH recommended a limitation of no more than a seven-year background check, which is a time period specified for security clearances, and discussion at the TICH with Continuum of Care agencies recommended a 12-month background check in order to recognize rehabilitation efforts of the tenant. Further discussion at the TICH also included consideration of limiting access to arrest records in background checks, so that only criminal records were available.

Another consideration for this suggestion is whether this would be a regulation that would affect only subsidized housing or also market rate housing – in both cases it would be highly disputed by property owners as taking away business rights from private sector property owners that they believe would arguably have a direct impact on their ability to earn funds. Even if only applied to state or federally-funded housing assistance, it could have the unintended effect of disincentivizing properties from participating in those programs.

Finally, it should be noted that there has been at least one legal case (Williams v. Rochester Hous. Auth., Civil Action No. 03 CV 6005 [W.D.N.Y. April 7, 2005] consent decree) in which an applicant for housing assistance who was denied because of a background check, was later granted access due to reasonable accommodation. After conviction due to drug possession and before application for housing, the applicant completed a two-year residential drug treatment program and became a certified nurse aide. The reasonable accommodation to consider mitigating factors was accepted due to the applicant’s disability based on past addiction.

1e. Past debts and problematic rental history should not automatically disqualify prospective tenants.

Recommendations from the public included that the State should provide guidance that utility debt or other types of debt should not categorically disqualify a prospective tenant. Several recommendations from the online forum were to create alternative screening criteria for Veterans with high housing barriers.

Considerations: A blanket policy that affects all tenants may disqualify tenants with utility debt or other debts, even if the tenants will receive rental assistance or can afford the rent on their own. Instead,

landlords/property owners could determine on a case-by-case basis if the tenant qualifies for a lease/rental agreement depending on the ability to pay the rent and the amount of the debt.

In addition, the TICH Veteran Workgroup brought up low credit scores as a barrier to housing for certain Veterans. Again, landlords/property managers could determine on case-by-case basis if the tenant qualifies for a lease/rental agreement depending on the ability to pay the rent and the amount of the debt.

The TICH discussed the possible risk that may arise for the landlord if the utilities are in the landlords' name. In addition, the landlord may be faced with the possibility that the Veteran cannot turn on the utilities because of past debts with the utility company.

2: IDENTIFICATION, INCREASED INFORMATION SHARING, AND INCREASED COORDINATION

Identification

At the roundtables, there was a discussion regarding the US Interagency Council for the Homeless' ("USICH") strategy to keep an active list of Veterans experiencing homelessness. The USICH published ten strategies to effectively end Veteran homelessness. The seventh strategy was to "identify and be accountable to all Veterans Experiencing Homelessness."¹

2a. Uniformly Assess Military Service

One recommendation from the public was to identify potential Veterans through one question: "Did you serve in the military?" instead of the more commonly-asked question, "Are you a Veteran?" Participants in the roundtables noted that not all persons who are Veterans consider themselves Veterans; for example, the person could have had a dishonorable discharge, or not qualify for United States Veteran Affairs ("VA") benefits, but could still meet the definition of Veteran. By asking "Did you serve in the military?" more persons who are Veterans may answer in the affirmative even if they do not identify themselves as Veterans.

This broad type of question for identification purposes is in-line with federal priorities. The USICH *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness* states that Veterans of all discharge statuses and Veterans who are not eligible for VA benefits and services are included in the *Opening Doors* initiative to end Veteran homelessness.² The question "Did you serve in the military?" quickly and simply identifies Veterans. The limitation with this generalization is that persons identified as Veterans through this approach will not necessarily be eligible for VA or other housing related services. Veterans would still need to qualify for benefits through a more specific set of questions that identify type of service, discharge type, and other factors required by the services being sought.

While not all Veterans programs would be available to all persons who have served in the military, agreement on Veteran status would ease the process of sharing information and eligible resources. Identifying Veterans in a uniform manner with a broad definition such as service in the military would provide organizations with standard criteria by which to count Veterans.

Considerations: This recommendation from the public focuses on identification of Veterans and not qualifying the Veteran for services. While asking "Have you ever served in the military?" may help identify Veterans, this would be one of several questions to determine for which services the persons are eligible. Identifying Veteran status is only the first step in qualifying Veterans for services, but it is a vital step. Discussion during the TICH meetings supported this recommendation.

¹ United States Interagency Council on Homelessness, June, 2016, p. 3.

² Ibid, p. 26.

Answering yes to “Did you serve in the military” would not automatically qualify a person as a Veteran, but would identify the person as someone to be screened to meet the U.S. Code Title 38, Section 101(2), which states “The term ‘veteran’ means a person who served in the active military, naval or air service, and who was discharged or released therefrom under conditions other than dishonorable.” The person would still need to show that they met the intake requirements for the services, such as length of service, active duty status, and discharge status. However, if the wording change from “Are you a Veteran?” to “Did you serve in the military?” assists in the identification of more persons to be screened to qualify for Veteran benefits, the question could be adopted as a best practice for State agencies and service providers.

TICH discussion of this recommendation also included ensuring the way that the question is asked, i.e., “Did you serve in the military” needs to be reflected in summary data of clients. For example, agencies need to make it clear that their clients served or did not serve in the military; the agencies should not summarize the data for their intake forms by stating that the persons they are screening are Veterans or not Veterans. Veteran status should be identified and summarized according to the definition of Veteran used for the programs.

Information Sharing and Identification.

At the roundtables and during the online forum, there were several recommendations on increased sharing of information.

2b. Increased use of 2-1-1 Texas Information and Referral Network (“TIRN”)

Recommendations received from the public included:

- encouraging more service and housing providers to use 2-1-1 as a method of finding resources for the persons in need of assistance; and
- increasing 2-1-1 outreach to inform Veterans and their dependents of 2-1-1 resources and services.

To accomplish the recommendation, the public discussion suggested legislation requiring more organizations to include information about their programs that will assist Veterans experiencing homelessness or at-risk of homelessness in 2-1-1. In addition, there was one recommendation specifically to include organizations that offered education and training opportunities in the 2-1-1 TIRN.

One related recommendation from the public had to do with creation of a State inventory of resources available specifically for Veterans experiencing homelessness in each community.

Considerations: The 2-1-1 TIRN is administered by the Health and Human Services Commission (“HHSC”). Many of the recommendations from the public regarding 2-1-1 TIRN demonstrate a lack of knowledge of what is currently available in 2-1-1. This lack of knowledge supports the development of an outreach campaign to educate the public on the resources available in 2-1-1.

In 2014, the Housing and Health Services Coordination Council contracted with the Center for Sociological Inquiry at Texas State University to conduct a study called “2-1-1 Texas Information and Referral Network Evaluation.” The study sought to provide better understanding of the 2-1-1 TIRN in Texas. Several key findings resulted from the study, one of which was to “improve marketing of the 2-1-1 TIRN,” specifically of the 2-1-1 website and unexpected resources found in 2-1-1.³ This finding provides more support an outreach campaign to educate the public on the resources available in 2-1-1. It should be noted that some Aging and Disability Resource Centers are 2-1-1 information centers, which function as the 2-1-1 referral entity.

The 2-1-1 TIRN currently has an inventory of resources specifically for Veterans, as shown online at <https://211texas.bhsc.state.tx.us/211/veterans/home.do>. Furthermore, as a result of this recommendation from the public, HHSC is currently working to include the Veteran County Service Officers for Veteran resources in 2-1-1. The 2-1-1 TIRN also has resources on housing choices <http://www.211texas.org/housing-choices-finding-a-place-to-live/>, including resources for persons experiencing homelessness. In addition, 2-1-1 is currently working to add a feature on the Veteran webpage with resources specifically for Veterans experiencing or at risk of homelessness.

Regarding the recommendation from the public on including more organizations in 2-1-1 TIRN, HHSC offers a way for organizations to voluntarily include their information in 2-1-1. The standards from inclusion or exclusion of services are derived from the national Alliance of Information and Referral Systems. The 2-1-1 website shows an entire page dedicated to adding or editing a 2-1-1 listing and the criteria to be included is at <http://www.211texas.org/add-or-edit-your-2-1-1-listing/>.

In regards to education services provided in 2-1-1, HHSC is working on the inclusion of Texas Workforce Commission resources that may assist with training and education for employment opportunities. Education and training specifically for Veterans can be found online at Texas Workforce Commission’s website at <http://www.twc.state.tx.us/jobseekers/just-veterans>.

In regards to the information provided in 2-1-1, the 2014 Housing and Health Services Coordination Council study of 2-1-1 noted that

“[TIRN’s] use of the 25 regional [Area Information Centers] provides important advantages. Each [Area Information Center] has an outreach coordinator who is responsible for identifying service providers in the area and updating the database. Doing this locally allows the outreach coordinators to specialize in a specific area and more thoroughly identify the organizations that are available to provide resources.”⁴

The study went on to include a finding regarding the resources in 2-1-1, including a recommendation to:

“...develop a more reliable system for updating the database with resources provided by Health and Human Services enterprise agencies, TDHCA and other state resources.

³ Housing and Health Services Coordination Council, August 31, 2014, p. 12

⁴ Ibid, p. 5.

- *The state should consider an approach to enter these resources centrally and have outreach coordinators from [Area Information Centers] focus on identifying and updating local resources.*
- *State agencies that provide services should have standard processes for submitting the services they provide for inclusion in the TIRN database and for providing updates as needed.*
- *The state should consider a policy that requires agencies that provide services and receive state funding to be listed in the 2-1-1 database.”⁵*

The recommendation from the Housing and Health Services Coordination Council shows that additional interagency education and awareness of 2-1-1 processes for including resources should be conducted at the State level. To include more State resources in 2-1-1, State agencies could require participation of their subrecipients or sub-grantees in 2-1-1 by rule. This rule may require subrecipients or sub-grantees to update their information in 2-1-1 on a regular basis.

As for the recommendation from the public regarding a State inventory of resources, the Reentry Task Force Resource Guide could be a model of an inventory of State resources. The Reentry Resource Guide was tailored for persons reentering the general population after incarceration. This guide may provide a model for an inventory of resources for Veterans experiencing or at risk of homelessness. The Reentry Resource Guide, created as a result of 84(R) Legislative Session’s Senate Bill 578, required the Texas Department of Criminal Justice to create the guide by collaborating with nonprofit organizations that specialize in criminal justice issues; faith-based organizations; organizations that offer pro bono legal services to inmates; and organizations that are composed of the families and friends of inmates. SB 578 required the Texas Department of Criminal Justice to compile county-specific information packets. The Reentry Resource Guide included a table with a column for: county; reentry services; type of resource; address; contact/phone; web address; and comments. The Reentry Resource Guide is available online at http://tdcj.state.tx.us/documents/rid/RID_Reentry_Resource_Guide.pdf.

Coordination with Veterans

Ongoing communication with Veterans when developing policies that could affect Veterans at-risk of homelessness was suggested as a way to understand Veterans’ “comfort zones.” It should be noted that there were several mentions that Veterans often did not ask for help when they needed it.

2c. Veteran Advisory Workgroup

Recommendations received from the public included asking Veterans what they would need to exit homelessness or reduce being at-risk of homelessness. An idea was to create a workgroup for the prevention of homelessness among Veterans. A State workgroup that includes Veterans was recommended as a way for Veterans to be asked directly about their needs instead of requiring Veterans to come forward with their needs.

Considerations: The Texas Veterans Commission supports the legislatively-established Texas Coordinating Council for Veterans Services. The membership is outlined in legislation and represents

⁵ Ibid, p. 12.

twenty-two State agencies that work directly with, and/or provide benefits and services to Veterans and their dependents.

The Texas Coordinating Council of Veteran Services members created a number of committees, such as Housing, Employment, Education, Transportation, Women Veterans. The committees consist of Texas Coordinating Council of Veteran Services members as well as employees of other State agencies and public, private and non-profit organizations that work on issues affecting Veterans. Anyone is welcome to serve on the committees. Committee chairs and members seek the advice and counsel of Veterans. While there are Veterans on the Coordinating Council, the Veterans are either State employees, federal employees, or representatives of local veteran service organizations. There are no Veterans on the Council who do not represent an organization.

There may be benefit to include Veterans who have been at-risk of homelessness or experienced homelessness, or persons that work with Veterans who have been at-risk of homelessness or experienced homelessness on existing committees or councils. For example, a Veteran County Service Officer who works with Veterans at-risk of homelessness or experiencing homelessness may offer insights into Veteran needs. However, creating a new Veteran Advisory Workgroup may be counterproductive to the existing workgroups and councils that are already in place by duplicating efforts.

2d. Peer-to-Peer Veteran Network and Veteran Support.

Recommendations received from the public included the creation of a peer-to-peer Veteran network. The network would be developed to have Veterans discussing housing and service options with Veterans at risk of homelessness or experiencing homelessness.

Recommendations from the public also included using Veterans as leaders in groups that support and stabilize Veterans who are at-risk of homelessness.

Considerations: A Peer-to-Peer Network already exists through the Military Veteran Peer Network, available online at <http://www.milvetpeer.net/>. The Military Veteran Peer Network has four staff members who work at the Texas Veterans Commission headquarters. There are also Military Veteran Peer Network coordinators in the field who work for Local Mental Health Authorities. A creation of a new network would be counterproductive and duplicative of the existing network. Due to the recommendations for a peer-to-peer network, the Military Veteran Peer Network may consider an outreach campaign to the public to expand knowledge of the services it provides.

Coordination among Service and Housing Providers

Persons experiencing homelessness may have multiple issues that contribute to their lack of stable housing. By increasing coordination among local service and housing providers, multiple issues may be addressed by a group of organizations.

2e. Conceptualize Systems Instead of Funding Streams

One common theme echoed throughout the roundtables and the online forum was to change the mindset of the service and housing providers from thinking about their specific funding

streams to thinking about a system of services as a whole. Instead of concentrating on what their programs can provide, focus instead on what the Veterans experiencing homelessness or at-risk of homelessness need and how the different programs can work together to create a system of support. With referrals and coordination in place, organizations can work together to address the multi-faceted needs of the Veteran experiencing or at-risk of homelessness, including mental health, job training, community reintegration, and housing.

The term “wraparound services” and “mainstream services” were used in public comments. The Texas System of Care, a nonprofit organization, states: “Wraparound mobilizes resources and talents from a variety of sources resulting in the creation of a plan of care that is the best fit between the family vision and story, team mission, strengths, needs, and strategies.”⁶ Discussion with the public included the need for the wraparound services such as food vouchers, furniture, and housing retention services.

Mainstream benefits are considered non-homelessness-related resources, such as Temporary Assistance for Needy Families, Supplemental Security Income (“SSI”), Medicaid, and Veteran’s services.⁷ Since a majority of homeless assistance is focused on overcoming a housing crisis, the homeless assistance is time limited and will end after a crisis has ended. If persons are connected to mainstream benefits, they will be more likely to be stabilized after the homeless assistance ends.

Considerations: There are multiple councils and working groups at the State that work toward creating a framework for system of support. Through these groups, the State works toward functioning as a system instead of as funding streams. While looking at the individuals needs as a whole is critical, service and housing providers are still obligated to consider programming from the perspective of their specific funding streams as the regulations that govern most program sources are varied and disparate.

2f. Coordinated Entry

Recommendations received from the public included the expansion of the coordinated entry/assessment system. The Continuum of Care (“CoC”) Program administered by HUD requires CoCs to establish a coordinated entry system in their geographic area. According to HUD, “The primary purpose of a coordinated assessment system is to make rapid, effective, and consistent client-to-housing and service matches—regardless of a client’s location within a CoC’s geographic area—by standardizing the access and assessment process and by coordinating referrals across the CoC.”⁸

Recommendations received from the public included integrating agency and government silos, so there could be one intake used for multiple programs and services. An example was given in Austin, in which the CoC allowed client progress to be accessed through the Homeless

⁶ Texas System of Care, 2016.

⁷ Burt, M et al, March, 2010.

⁸ United States Department of Housing and Urban Development, n.d.2, p. 2

Management Information System. Access to the Homeless Management Information System was managed through documents allowing Release of Information from the persons whose information was entered into the system.

Recommendations received from the public included locating all service intake processes in one location. The services suggested were mental health, substance abuse treatment programs, social services providers, medical services, and employment services. While not all coordinated entry systems include locating services in one location, this is an option for implementing coordinated entry.

Recommendations received from the public included having services and housing intake workers screen for Veteran status during the coordinated assessment screening process.

Recommendations received from the public included having nontraditional partners use coordinated entry, which worked in Austin and may work in other areas of the State. Traditional partners of coordinated entry are housing and service providers. In Austin, property management companies were allowed to use the coordinated entry system after the companies were vetted through the Mayor's Office.

Considerations: Coordinated entry goes by many different names: Coordinated assessment, centralized intake, and others. Per 24 Code of Federal Regulations ("CFR") 578.7(a)(8), the CoC Program interim rule requires the CoC to "establish and operate either a centralized or coordinated assessment system that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services." The CoC agencies are required to create the coordinated or centralized assessment in consultation with the Emergency Solutions Grants ("ESG") Program, and the ESG Program is required to work in consultation with the CoC Program. Coordinated entry is required in every CoC, though coordinated entry takes different forms and formats.

Many of the recommendations received by the public above were examples of local successes. One benefit of coordinated entry is that it can be tailored to local needs. For example, while some coordinated entry systems locate all services in one area, other coordinated entry systems have services in several different areas and ensure that the clients receive the same level of service no matter where he/she enters the system. One way to tailor coordinated entry for Veterans may be to encourage coordinated entry to include at least one intake point at a local Veteran County Service Office.

If coordinated entry is being used to track Veteran's progress, it may be helpful for more partners to be able to participate in coordinated entry. However, the privacy of the clients must also be respected and privacy controls must be in place before nontraditional partners can use the coordinated entry system.

Veterans experiencing or at-risk of homelessness access multiple agencies, such as TVC, HHSC, and TDHCA. One consideration may be information sharing agreements so Veterans do not have to go through intake more than once for programs administered by these agencies. Aging and Disability Resource Centers ("ADRCs") are working to coordinate among HHSC agencies, and their progress

may be able to be duplicated with Veterans experiencing or at-risk of homelessness. However, it must be noted that any data sharing of medical information is governed by the Health Insurance Portability and Accountability Act, which has many safeguards. Because of the high confidentiality concerns for medical data, information sharing agreements may consider limiting or eliminating the inclusion of medical data.

The TICH discussed the possibility of including ADRCs in coordinated entry. The Health and Human Services Enterprises have Long Term Services and Supports (“LTSS”) screening, which may assist someone who has been identified in coordinated entry as needing LTSS.

There are 11 CoCs active in Texas, each with their own governing boards and coordinated entry systems. While the State interacts with the CoCs during the course of its activities that have to do with homelessness, the State does not have authority to institute a change in the CoCs’ coordinated entry systems. However, the State could offer incentives for innovative coordinated entry practices or provide for such requirements in association with State homelessness funds.

2g. Coordination with VA-Resources

Because federal programs are outside the scope of this report for the State, no recommendations to change federal programs have been included. However, several recommendations were made by the public about better coordination between the VA, the State, and local agencies.

If a Veteran was denied VA services or housing, recommendations received from the public included that State or local agencies should have resources available for the Veteran to appeal the denial.

Recommendations received from the public included that non-federal service or housing providers should work with Veterans experiencing or at-risk of homelessness to help the Veteran access services or housing.

Recommendations received from the public included making sure Veterans experiencing or at-risk of homelessness who were denied VA benefits would be connected to other non-VA-related state or federal resources that could provide health or mental health resources and services. Discussion focused on the creation of a standard procedure so that, if a client is a Veteran experiencing or at-risk of homelessness that has been denied VA services, the intake workers should be prompted to process SSI and Social Security Disability Insurance (“SSDI”) for that client.

If the VA screening process was unavailable, recommendations received from the public included making sure a Veteran could use non-VA resources as appropriate.

Considerations: The Veteran County Service Officers help with obtaining benefits for which Veterans are entitled from the VA. In addition, from TDHCA’s experience, Veterans who qualify for state resources receive those resources even if the Veteran has been denied federal resources.

2h. Coordination with TVC

One recommendation from the public was to rewrite policies and procedures at the TVC so that resources can be allocated in local offices. The online forum participant commented that “[w]hat works in Dallas or Houston does not work in Abilene or San Angelo.” The commenter suggested that TVC staff be trained in advocacy, collaboration, and negotiation in order to reach solutions at the local level.

Considerations: Most of TVC’s polices are regulated by state statutes and would require legislative action for deviation. Additionally, per state law, TVC cannot contract out its mandated responsibilities to other entities. The idea for local control is the core mission behind the Fund for Veterans Assistance. Several counties have partnered with their local financial assistance TVC office and developed grant proposals and received funding to assist needy veterans. These grants ensure accountability through performance measure reporting and financial account auditing. Increased funding for grants projects in local communities around the state would require additional funding from the Texas legislature.

Coordinating Communication among Stakeholders.

In order to build systems of care, stakeholders need to better communicate. The roundtables and the online forum all touched on the theme of more and consistent communication.

2i. Coordinating Communication

Recommendations from the public included building on the progress of Austin’s efforts in the Mayor’s Challenge to End Veteran Homelessness to bring all stakeholders together regularly, including the social service and housing community, such as the Local Mental Health Authority, the CoC, the Public Housing Authority, and Supportive Services for Veterans Families Providers; private organizations such as the Apartment Association, Board of Realtors; federal resources, such as the VA; and public leaders, such as the Mayor and the Texas Senator’s Office. The group met or communicated weekly.

Considerations: The Austin Mayors Challenge, as well as four of the other eight cities that took the Mayors Challenge to End Veteran Homelessness, had weekly, bi-monthly, or monthly stakeholder meetings (see Appendix J in this report for a result of the survey of the cities that took the Mayors Challenge to End Homelessness.) The State could encourage increased communication among local stakeholders through requiring a degree of coordination in association with its State homelessness funds.

Furthermore, existing workgroups or councils could expand membership, especially to encourage local entities such as cities, to participate. If local entities do not become members, public comment periods of State documents are times when dialogue can be shared between the State and local entities.

2j. Community Leaders Encouraging Relationships with Private Sector

Recommendations received from the public included using Austin’s success as a model to involve the private sector. Austin’s Mayor used the influence of the office to involve the private rental market in the effort to end homelessness among Veterans.

Another example from the private sector was the success of the Mayor's Challenge to raise private funds to pay a portion of the rent for Veterans who already had HUD-VASH vouchers but who were unable to find rental properties within the rent limits set by HUD.

Considerations: It is unclear how the State would recommend specific action for local community leaders. However, the State may educate the public with a repository of best practices that has worked in local communities.

The use of private funds to pay a portion of the rent for Veterans with HUD-VASH vouchers or other types of rental assistance could be considered as an activity by foundations or other nonprofit organizations. A study may be helpful in determining the effectiveness of buying down rents to effectively use rental assistance programs.

2k. State Encouragement of Efforts to End Veteran Homelessness.

Recommendations received from the public included having the State encourage local government to support and address the needs of Veterans experiencing or at risk of homelessness.

Considerations: Through many State programs and initiatives, the State works to assist persons experiencing homelessness or at risk of homelessness. The Department of State Health Services' ("DADS") Aging Texas Well Workgroup created a Community Assessment Toolkit to determine how well communities are meeting the needs of persons who are elderly at <http://www.aarp.org/content/dam/aarp/livable-communities/plan/assessments/aging-texas-well-community-assessment-toolkit-2009-aarp.pdf>. A similar toolkit could be developed for communities to determine if communities are meeting the needs of Veterans experiencing or at-risk of homelessness in their communities. However, there may be fair housing implications for singling out one population over other populations experiencing or at risk of homelessness.

3: INCREASE HOUSING AND SERVICES RESOURCES

More Housing and Services Resources

The roundtables and the online forum included discussion on the lack of available housing resources and the need for more affordable housing or housing programs and services.

3a. State Funding For Housing

Recommendations received from the public included increasing funding for housing assistance, such as developing more affordable housing units, rent for rapid re-housing of persons experiencing homelessness, housing counseling, rental application fees, and rental deposits.

Considerations: The need for affordable housing in the State is significant; most of the affordable housing programs administered by TDHCA have more applications for funding than funding available. The challenge is to identify potential new sources of funding as well as maximizing existing funding sources.

The Texas Veterans Coordinating Council for Veteran Services' draft report for 2016 currently recommends an increase in the Texas Housing Trust Fund which is managed by TDHCA. In State Fiscal Years 2016 and 2017, the Texas Housing Trust Fund received a total of \$11,792,500. Per the General Appropriations Act of 2016-17 Rider 15, "Out of funds appropriated [for the] Housing Trust Fund, the Texas Department of Housing and Community Affairs shall establish an Interagency Contract to provide 10 percent, not to exceed \$4,300,110 for the 2016-17 biennium (\$4,200,110 for grants and \$100,000 for administration), to the appropriate fund or account with the Texas Veterans' Commission for the purpose of administering a Veterans Housing Assistance Program that will assist Texas veterans and their families in obtaining, maintaining or improving housing." For the 2016-2017 biennium, the interagency contract with the Texas Veteran Commission was \$1,179,250.

3b. State Funding to Compensate for Supportive Housing for Veteran Families Reduction

The Texas Homeless Network, with support from many rural counties, made a recommendation to use Texas Veterans Commission or other State funds to replace the loss of \$9,940,191 for Priority 1 communities currently receiving Supportive Services for Veteran Families ("SSVF"). The Texas Homeless Network stated that SSVF Programs in 54 Texas counties were going to end in March 2018. The SSVF Program might be the only source of homelessness prevention and rapid re-housing funding in many rural communities. The recommendation to use Texas Veterans Commission or other State funds to replace the loss of \$9,940,191 in SSVF funds was endorsed by SSVF providers in 83 Texas counties.

Considerations: The US Department of Veterans Affairs ("VA") announced that it would provide 3-year non-renewable grants to eligible entities proposing services for Priority 1 communities starting in 2014. Priority 1 communities were identified by the VA as having factors such as unmet service needs, high level of Veteran homelessness, high levels of Veteran poverty, and the high size of the Veteran

⁹ House Bill Number 1, 2015, p. VII-7.

population. The VA funding was called “surge” funding for a three-year effort toward ending Veteran homelessness.¹⁰

Programs to assist persons experiencing homelessness are in many different State agencies, as indicated by the table in Appendix M of this report.

3c. Affordable Housing and Housing Services in Rural Areas

Recommendations received from the public included rehabilitation of existing housing stock, outreach and presence of housing counselors and services in rural areas.

Discussion at the roundtables and online forum revolved around substandard housing stock in rural areas. If housing cannot pass the federal Housing Quality Standards, the unit cannot participate in many government housing programs. The Texas Homeless Network commented that Veterans may be hesitant or unable to leave their communities of origin because of familial obligations, personal ties to the community or medical needs. The Texas Homeless Network stated on the online forum that it “suggest[s] that TDHCA make funds available to rehabilitate substandard housing in high-need rural areas so Veterans can remain in their home communities.” The Texas Homeless Network describes high-need rural areas as areas with a high number of housing units that would not pass the Housing Quality Standards.

Recommendations received from the public included developing affordable housing in rural areas because the land is less expensive than in urban areas. Veterans would be able to use the newly-developed affordable housing.

Recommendations received from the public included placing greater emphasis on the choice of Veteran experiencing or at risk of homelessness for where he/she wants to live, rather than the geographic location of the affordable housing or service areas for housing. Currently Veterans choices are based on service areas in which the housing is offered, even in voucher programs which are tied to geographic service areas.

Recommendations received from the public included the expansion of HUD-VASH into rural areas.

One commenter in the online forum stated that “Veterans deserve safe and sanitary housing, regardless of where they choose to live.”

Considerations: There are several federal and state housing resources available in rural areas. The United States Department of Agriculture (“USDA”) has several housing programs, such as the Multi-Family Housing Direct Loans and the Single Family Housing Repair Loans and Grants (504) Program. TDHCA’s HOME Investment Partnerships Program is required by Texas Government Code §2306.111(c)(1) to expend 95% of its funding in areas of the State that do not receive HOME funding directly from the federal government, which are mainly rural areas. TDHCA’s Housing Tax Credit Program offers a rural USDA set-aside of 5% to layer funding with rural developments financed through

¹⁰ Federal Register, January 14, 2014.

USDA. In addition, the Texas Department of Agriculture's Community Development Block Grants ("CDBG") Program, which is used mainly in rural communities for infrastructure, could be used for housing if local communities indicated that they wanted to use the funding for housing.

However, in TDHCA's experience, there are many areas of the State which have limited experienced housing providers. Although TDHCA makes funding available in rural areas, there may not be local organizations that are able to take on the responsibilities and complexities of administering a federal housing program. As discussed during the TICH meetings, a Community Housing Development Organization ("CHDO") can apply for funds to provide housing in rural areas of the State as long as the CHDO can show the service area of the CHDO is the geographic area in the application; however, the service area for a CHDO cannot be the entire State due to federal limitations. Also, it should be noted that, although inexpensive land is one component of how housing development citing is determined, there are many other components such as sufficient market demand, employment, and transportation options.

The TICH discussion also included the idea that a Veteran should be assured of being able to move to a community in which he/she felt the most comfortable, whether that was a rural community or urban community.

In terms of housing choice between rural and urban locations, portability is a feature of the Housing Choice Voucher (a.k.a. Section 8) Program that allows an eligible family with a housing choice voucher to use that voucher to lease a unit anywhere in the United States where there is a public housing agency operating an housing voucher program. Also, in September 2015, HUD instituted new regulations relating to portability to enable public housing authorities to better serve families and expand housing opportunities by improving portability processes. In 2016 HUD is proposing a change to the Continuum of Care rule that will allow some clients receiving rental assistance with Continuum of Care funds to move out of the Continuum of Care geographic area. While not yet a final rule, the Continuum of Care proposed rule could allow for greater mobility for tenants exiting homelessness.

While the State cannot increase funding for HUD-VASH vouchers, which is a federal program, TDHCA properties cannot refuse to rent to a tenant based on use of Section 8 or HUD-VASH vouchers.

3d. Develop Mini-Housing and Communal Living

Recommendations received from the public included creating mini-housing and communal housing options, with efficient transportation systems.

Considerations: There are several news stories within the last five years about mini-housing, also called tiny houses or micro-housing. Mini-housing is extremely small housing that can be built for minimal cost and used either for communal living or private living. Reports of micro-housing show the units can be as small as 144 square feet¹¹, and have been used for persons experiencing homelessness in places such as

¹¹ Tortorello, February 19, 2014.

Pittsburg, Seattle, and Los Angeles. Costs range from \$5,000¹² to \$25,000¹³, though communal land and common building costs have reached up to \$88,000.¹⁴ At the date of this writing, limited documented research on the effectiveness of micro-housing for the homeless community has been found, although several nonprofits in the country consider their micro-housing successful.

The micro-housing concept is now being attempted in Texas at Community First! Village in Austin by Mobile Loaves and Fishes and the Cottages at Hickory Crossing.

Community First! Village is self described as “a 27-acre master-planned community that will provide affordable, sustainable housing and a supportive community for the disabled, chronically homeless in Central Texas.”¹⁵ Residents must be experiencing chronic homelessness in order to qualify for housing. Each potential tenant will go through a criminal background check processed by the Federal Bureau of Investigation (“FBI”), though each case of criminal activity will be reviewed by qualified personnel for compatibility with the Community First! Village. However, registered sex offenders are prohibited.¹⁶

The Village is based on a Housing First model, so residents do not need to be free of drug and alcohol addictions to qualify. Furthermore, all residents of the Village must agree to three rules:

- “1. Everyone must pay rent on time,*
- 2. Everyone must be obedient to civil law, and*
- 3. There will be additional rules of the community not unlike a homeowners association that all must comply with.”¹⁷*

The Austin/Travis County Integral Care is working with University of Texas at Austin to conduct an evaluation of Community First! Village, as well as other service providers. As part of its Healthy Community Collaborative’s grant from the Department of State Health Services, the Austin/Travis County Integral Care evaluation includes an examination of the nature of the interventions, improvement on quality of life, housing stability, increase in income, recidivism, and other improvements factors. University of Texas at Austin is working to deliver the evaluation at the end of state fiscal year 2016.

The Cottages at Hickory Crossing is a community of 50 400-square foot cottages to “house the most expensive homeless neighbors in the city of Dallas.”¹⁸ The goal of the Cottages at Hickory Crossing is:

“to develop and implement Texas’ premier model of Housing First, providing:

- On-site access to most services... including high-quality mental & medical healthcare and social services.*
- Integration of services... a team approach to housing, healthcare and social services.*

¹² Ibid.

¹³ Mobile Loaves and Fishes, June 6, 2015.

¹⁴ Tortorello, February 19, 2014.

¹⁵ Mobile Loaves and Fishes, June 6, 2015.

¹⁶ Ibid.

¹⁷ Ibid.

¹⁸ City Square. n.d.

- *Improved behavioral health and physical health outcomes... and quality of life of individuals served by the program.*
- *Cost savings to taxpayers... through reduced expenditures on public safety, behavioral health and healthcare.*
- *Ongoing research and evaluation... of program and clinical outcomes to guide future programs.”¹⁹*

At a later date, research on the effectiveness of micro-housing may be available through Austin/Travis County Integral Care evaluation of Community First! Village or the Cottages at Hickory Crossings ongoing research and evaluation.

If micro-housing proves to be a successful way to alleviate homelessness, TICH membership discussed the possible need for zoning regulations to be evaluated that may impede micro-housing. The TICH discussed research to see how many urban communities would allow micro-housing within their jurisdiction.

3e. Flexible Funding

Recommendations from the public included a need for a flexible funding source. Several small groups during the roundtables discussed that federal and state funding can have a large number of regulations and restrictions creating gaps between what the Veterans need and what costs are eligible. The funds needed to fill the gaps are associated with what The Way Home Houston calls a housing “barrier buster,” such as security and utility deposits, furniture, household goods and food.²⁰ While security, utility deposits and food may be offered through various government programs, the strict definitions of homelessness or at-risk of homelessness may leave some Veterans without access to assistance needed to gain housing. Flexible funding is recommended to fill the gaps.

Considerations: Federal and state programs are governed by regulations, either in government codes or rules. The regulations restrict the use of the funding. In order to have flexible funding, the regulations governing the programs would need to be amended so they can be general and broad. It should be noted that regulations are a safeguard against misuse of funding.

Faith-based and nonprofit fund raising or funds from foundations could be used as sources of flexible funding.

3f. Community Transportation Options

Recommendations from the public included providing Veterans experiencing homelessness with more access to transportation options. Discussion revolved around Veterans experiencing or at-risk of homelessness having difficulty getting to appointments for services because of lack of community transportation options. An online forum participant made a recommendation to provide more funding to create an adequate transportation system, with buses that are on time and functioning within the time periods that the public needs. Other

¹⁹ Ibid.

²⁰ The Way Home, February 23, 2015.

recommendations included increasing public transportation options, or partnering with cab companies or rideshare services.

Considerations: The Texas Transportation Commission develops its plans for funding through a public process. The Texas Transportation Plan (TTP) 2040 was adopted on Feb. 26, 2015 and serves as TxDOT's long-range, performance-based transportation plan. "The plan addresses the statewide federal planning requirements and guides planning and programming decisions for the development, management, and operation of the statewide, multimodal transportation system in Texas over the next 25 years. The plan includes, among other information, a future infrastructure inventory and service needs, which may include such types of unique considerations such as the recommendation provided. The TTP 2040 was developed through a collaborative process of metropolitan planning organizations and communities, as well as city, county, transit, stakeholder and private company officials."²¹

3g. Legal Assistance

Recommendations from the public included expanding the Veterans Treatment Courts so that more Veterans would be diverted from the court system. In addition, feedback from the roundtables was that Veterans who are involved in the court system should receive support services for legal assistance.

Considerations: Veteran Treatment Courts were created during the 81st Texas Legislature in 2009. When the Veterans Courts were created, state law in Chapter 617 of the Texas Health and Safety Code stated that "A veteran who has been arrested for or charged with any misdemeanor or felony offense may be eligible if the attorney for the state consents to the defendant's participation and the court finds that the defendant is a veteran or current member of the U.S. armed forces and suffers from a traumatic brain injury (TBI), post-traumatic stress disorder (PTSD), or other mental illness or disorder that is a result of military service in a combat zone or other hazardous area and affected the criminal conduct at issue. Upon a defendant's successful completion of a veterans court program, the court will dismiss the criminal action."²² Harris County was the first in Texas to implement the program, which now expands to several areas in Texas including Travis County.

The 2-1-1 Texas Information Resource and Referral Network ("TIRN") offers referrals to legal resources. These legal resources may include local bar associations or legal aid organizations which may offer free or low-cost legal services for persons with low incomes.

3h. Education for Veterans

Recommendations from the public included locating Veteran services closer to colleges and universities to make attendance at an institute of higher learning easier for Veterans.

Considerations: While education is one vital service needed for some Veterans, there many other services that may be as vital for other Veterans, such as access to jobs or access to child care. Locating Veteran services near education may be helpful for the Veterans needing education, but there are many other

²¹ Texas Department of Transportation, 2014-2015.

²² Marchman, September, 2012, p. 617.

options for location that might be equally as helpful to other Veterans. In addition, online courses may address the education needs of Veterans without any geographical barrier.

In addition, institutions of learning may have offices of Veteran services that work to connect Veterans to scholarships, financial aid and services specifically for Veterans.

Increased Use of Existing Housing Resources

In order to use existing housing to the fullest, roundtables and several participants in the online forum discussed various options to increase the use of existing housing resources by Veterans experiencing homelessness.

3i. Housing First Model

Recommendations received from the public stated that Veterans should be offered housing using a “Housing First” model. Housing First connects the client to stable affordable housing, optional individualized case managed care and support services. After basic needs are met, the case manager may help the client to accomplish other life goals, if the client chooses to accept the services.

It should be noted that more than one participant in the online forum suggested that housing be the last type of assistance offered, after services offered for stability, such as mental health services or substance abuse treatment providers, were already provided.

Considerations: Support for Housing First exists in other State reports. The Housing and Health Services Coordination Council’s draft 2016 Report found strong support for the Housing First model: “Based on a synthesis of various views on Housing First it appears that some of the key principles of a Housing First model include:

- *Individuals being respected and treated with dignity;*
- *Services and housing being directed by the individual;*
- *Services offered being recovery oriented;*
- *Individuals being given the opportunity to live with the greatest possible level of independence;*
- *Selection or acceptance of offered services not being directly tied to housing or vice versa;*
- *There being a focus on reducing risk of harm;*
- *Services being offered for as long as necessary; and*
- *An underlying value that access to housing should be extended to persons in need of services, including treatment for substance used is order, as well as to persons who do not need those services.*

Based on a review of significant studies and receiving in depth reports on the housing first model, the Council finds that there is strong support for the adoption of a Texas Housing First approach in many state and local efforts to address the significant issues that impact individuals and households of extremely low income who are homeless, at risk of homelessness, or unstably housed.”²³

²³ Housing and Health Services Coordination Council, 2016, p. 3

It should be noted that the case management for Housing First could be provided as a partnership between the housing and service providers, or it could be provided through homelessness programs, such as Emergency Solutions Grants, for which case management is an eligible activity.

TICH membership discussed several aspects of Housing First models. Discussion centered on the definition of a “true” Housing First model with no barriers to housing. Another way to frame a Housing First model is a checklist, as designed by USICH, which shows “core” Housing First elements, such as accepting applicants regardless of their participation in services, and “advanced” Housing First elements, which includes housing the most vulnerable populations before other populations. Both are Housing First, even though “core” may have more barriers to housing than the “advanced.”²⁴

One suggestion from the TICH was to have a money management program so that a certified individual would receive a social security check on behalf of a client who is unable to handle money adequately because of a disability, such as brain injuries. An example of this process would be through Family Eldercare in Austin. Money management may be an optional service provided under Housing First.

Other TICH discussion around Housing First included the differences in implementation of Housing First by service providers or housing providers. Some housing providers have specific barriers, such as limitations on accepting registered sex offenders if the property located closer to schools. Service providers may be able to be broader without the geographic limitation for registered sex offenders. A suggestion was to make a distinction of Housing First between housing and service providers.

In addition, as discussed at the TICH, barriers to housing may be considered for juveniles who are under review for sex offenses. If the committees that review sex offenses for juveniles decide on a public registration versus a non-public option, then one of the outcomes may be a barrier to housing.

3j. Host Housing Events

Recommendations received from the public included replicating housing events that one of the forum participants found successful. The housing events could occur at one property; at a site where multiple property managers and emergency/transitional shelters are located; at coordinated entry sites; or at stand-down events. Housing events are like open houses for housing assistance providers to accept applications. The public described these events as a community of housing seekers with peer-to-peer supports. Veterans experiencing homelessness and others were better able to find housing assistance through the housing events than on their own.

Considerations: Although housing events would need to be coordinated at the local level, a State directory of resources considered in the Coordination Recommendations could aid in making information available at the housing events. The Texas Veterans Commission may be able to establish a method by which technical assistance could be provided to local communities to host a housing event.

Furthermore, Veteran County Service Officers may be able to help coordinate housing events while also providing resources, such as peer-to-peer networks, to help the Veteran experiencing or at-risk of

²⁴ United States Interagency Council on Homelessness, April, 2013.

*homelessness be more stably housed. Texas Government Code, Chapter 434, Subchapter B states that each county with a population of over 200,000 is required to employ a Veteran County Service Officer. According to the 2014 Texas Veterans Commission Report, 195 counties (75% of all Texas counties) are staffed with a Veteran County Service Officer. As stated in the report: "In addition to being experts in the field of claims representation and counseling, Veteran County Service Officers serve as the hub for information on all Veterans' services and resources within the counties and communities they serve. While impossible to master subjects and service areas as diverse as mental health, transportation, and housing, the Veteran County Service Officer should be able to connect Veterans within their county with the agencies, programs, and subject matter experts most able to provide those services in their area."*²⁵

The Housing Needs of Veterans, addressed in Appendix G of this study identified specific housing needs for women Veterans. For example, a needs assessment found that women Veterans experiencing homelessness were more likely to be accompanied by children than men Veterans. Housing to address persons with children would include multiple bedrooms or shelters that allow children. Housing Events should consider outreach to include persons with children, and making units with more than one bedroom available for Veterans facing homelessness.

3k. Time Period to Find and Retain Housing

Recommendations received from the public included increasing the time to find a housing unit that accepts tenant-based rental assistance (e.g., a housing choice voucher) and increasing the time to retain housing assistance if the participants take part in substance abuse treatment programs. For the HUD-VASH vouchers and other tenant-based rental assistance programs, the voucher recipient has a time limit, such as 60 or 90 days, to find a housing unit to rent. In locations that have rental markets with low vacancies, finding a landlord or property manager to participate in a government rental subsidy program may be challenging, as communicated by Houston and Austin's Mayor Challenges to End Veteran Homelessness. Therefore, a recommendation from the public was to give the participants in housing programs 120 or 150 days to find a housing unit.

In a similar theme, if a participant needed to undergo treatment for substance abuse, a recommendation from the public was that the participant be allowed to retain his/her housing for up to 90 days while in treatment.

Considerations: Public housing authorities, which are federally funded, have some flexibility to determine if they may extend the time periods to find a housing unit to use a housing voucher. The State-funded rental assistance programs can offer more flexibility in finding or retaining housing than federal programs might. The Homeless Housing and Services Program, authorized by the 81st Texas Legislature, does not have a time limit on finding a housing unit that will accept the rental assistance.

²⁵ Texas Coordinating Council for Veterans Services, October 1, 2014, p. 24.

3l. Priority on Waitlists for Veterans Experiencing or At Risk of Homelessness for Housing Tax Credit Properties

Recommendations received from the public stated that TDHCA's Housing Tax Credit Program should give priority to Veterans experiencing or at-risk of homelessness, allowing these Veterans to jump to the top of waiting lists.

Considerations: Veterans can be identified as priority populations on waiting lists if the property manager or owner chooses to give them priority. The priority for Veterans can be determined at the onset of the creation of the waiting lists. However, for existing waiting lists that were created before Veterans may have been specified as a priority, the persons on the current waiting lists must be served first before the priority of the wait list can change. If a Housing Tax Credit property manager is going to give Veterans priority, then all the persons on the existing waiting list should be served and a new waiting list that indicates that Veterans are going to receive priority will need to be created. However, properties that adopt a Veteran priority population would need to consider the possible fair housing implications.

3m. Set-Aside Units for Veterans Experiencing or At Risk of Homelessness

Recommendations received from the public stated that TDHCA should incentivize existing affordable housing developers to set aside units for Veterans, wherever possible.

The Texas Homeless Network recommended that TDHCA expedite the development of affordable housing, especially for Low Income Housing Tax Credit properties that agree to set aside units for Veterans experiencing or at risk of homelessness.

A recommendation from the online forum stated that cities should designate a certain percentage of affordable and sustainable housing to Veterans experiencing homelessness.

Considerations: The Qualified Allocation Plan ("QAP"), which governs the Competitive 9% Housing Tax Credit Program, offers points in the scoring criteria for developments that propose to set aside five percent of the units for persons with special needs. One of the nine special needs categories for the HTC Program is Veterans and wounded warriors.

The State does not have jurisdiction over cities' set-aside of housing.

3n. Access to Low Income Housing Tax Credits for Veterans with High Barriers

Recommendations received from the public suggested that TDHCA should modify the QAP to be less prohibitive regarding Veterans with low incomes and criminal history for the Low Income Housing Tax Credit Program.

Considerations: One of the strengths of the Housing Tax Credit Program is that properties are privately owned and managed. Criminal history issues considered for rental applications are established by the owners and managers of the properties. However, TDHCA will make owners and property managers aware of recent HUD guidance released on April 4, 2016 which states that criminal background should be considered on a case-by-case basis, and that a blanket policy of denying persons because of criminal records is discriminatory.

The income requirements for housing tax credits are federal requirements, and cannot be affected by the State.

4: IMPROVE ACCESS TO EMPLOYMENT RESOURCES

Several employment-related recommendations were discussed during the roundtables and online forum requesting public input on ending homelessness among Veterans.

4a. Job Search

The first employment recommendation received from the public was to better match the experience of Veterans with job qualifications.

The second employment recommendation received from the public was to identify Veteran-friendly employers. These would be employers who are able to easily translate military service duties to job qualifications.

The third employment recommendation received from the public was to coordinate with Temporary Worker Employment Agencies to transition Veterans from the military to working in civilian life.

Considerations: The Texas Workforce Commission (“TWC”) has 28 Workforce Development Boards, which are a group of community leaders charged with planning and oversight for workforce programs. TICH members have heard of employment counselors in Houston which work the local Workforce Development Board to connect persons experiencing homelessness with employment resources. Discussion during a TICH meeting with Continuum of Care agencies included observations that a majority of the persons coming for help had served in the Army, as compared to the other branches of service. Focus could be given to employment programs directly with persons separating from the Army.

TICH discussion also included linking persons separated from the military to volunteer organizations, such as volunteer fire fighters, in order to learn skills that may be helpful to find employment. In addition, the TWC offers internships which may help provide a steady history for a Veteran’s resume.

In 2016, the TICH oversaw a pilot program to mirror Houston’s employment program in rural settings. A VISTA Volunteer developed a pilot project outline, made connections with rural areas to host employment navigators, created materials to train the employment navigators, and conducted an evaluation of the pilot. Homeless service providers in Beaumont and Port Arthur made connections with local Workforce Development Boards. Through the pilot, employment navigators helped create individualized employment plans for persons experiencing homelessness.

In addition, the Texas Veteran Commission (“TVC”) has Veteran Employer Liaisons and Veterans Career Advisor, which are part of Veteran Employment Services team. These positions conduct assessments of training needs, education, experience, skills, interests and other relevant data to deliver the appropriate level of services and assist Veterans with barriers to employment. This includes working closely with Veterans to enhance their job search skills and efforts. TVC has representatives at many Texas Workforce Centers.

Also at the State level, the Texas Coordinating Council on Veteran Services has an employment workgroup which is working to submit employment recommendations in their Legislative Update. The TCCVS' website is <http://www.tvc.texas.gov/TCCVS.aspx>.

It should be noted that the Department of Labor has a program specifically for Veterans experiencing homelessness called Homeless Veterans Reintegration Program. From the Department of Labor website: "The program is 'employment focused' and veterans receive the employment and training services they need in order to re-enter the labor force. Job placement, training, job development, career counseling, resume preparation, are among the services that are provided. Supportive services such as clothing, provision of or referral to temporary, transitional, and permanent housing, referral to medical and substance abuse treatment, and transportation assistance are also provided to meet the needs of this target group."²⁶

4b. Employment Readiness

The fourth employment recommendation received from the public was to provide Veterans in employment programs with financial assistance to help with court fees or fines.

The fifth employment recommendation received from the public was to change state law to set a time limit of no more than 10 years for employers to do a background check. The commenter suggested character-based hiring practices. The commenter suggested that Human Resources rely too heavily on negative aspects, such as lack of transportation, negative indicators on a background check, or homelessness. First-time offenders that have been rehabilitated have a barrier to employment even after they have been rehabilitated.

The sixth employment recommendation received from the public was to help Veterans improve their interview skills.

Considerations: As previously discussed in a consideration for a recommendation regarding a criminal history background check for rental properties, TICH discussion included a suggestion of a seven-year limit on background checks, which is reported to be the same time period as required for certain security clearances. Further discussion at the TICH with Continuum of Care agencies recommended a 12-month background check in order to recognize rehabilitation efforts of the tenant.

In addition, during TICH discussion several Continuum of Care agencies recommended "banning the box" on job applications asking about criminal history. By removing the box on the employment applications that indicate whether candidates have criminal history, employers can learn about the candidates qualifications first, and allow the candidate to disclose later in the hiring process about criminal history. In this way, the candidates have more of a chance to be hired without automatic disqualification because of their criminal history.

Discussion during a TICH meeting also included increased use of TWC's internship program to build work experience. In addition, discussion at the TICH included TWC's fidelity bonding service helps at-

²⁶ United States Department of Labor, n.d.2.

risk job applicants get and keep a job. TWC and the Workforce Development Boards offer free fidelity bonding services to reduce employers' concerns about hiring at-risk job applicants who cannot be bonded through other sources.

The TVC's Employer Liaisons and Veterans Career Advisors may refer Veterans to employment opportunities based on qualifications consistent with employer requirements. These positions also conduct workshops that assist Veterans in job search activities including resume writing, interviewing, along with other skills.

4c. Living Wage

The seventh employment recommendation received from the public was to connect Veterans with employment that provided a “living wage” as opposed to a minimum wage.

Considerations: The minimum wage is established by the federal and state governments.

4d. Fair Employment Practices

The eighth employment recommendation received from the public was stricter enforcement of the American with Disabilities Act and Reasonable Accommodations in regards to hiring practices. The company should have to give a reason the person was not hired.

The ninth recommendation received from the public was to change state law to not allow companies to have non-smoking hiring practices. The commenter suggested that the non-smoking hiring practice was a form of discrimination.

Considerations: Persons who believe they may have been discriminated against in employment may submit a discrimination complaint through the TWC Civil Rights Division. The Civil Rights Division conducts neutral investigations and gathers information to determine if discrimination has occurred under the Texas Labor Code. The Civil Rights Division works in cooperation with the federal Equal Employment Opportunity Commission (“EEOC”) to resolve employment discrimination allegations.

To submit an employment discrimination complaint, all of these requirements must be met:

- *The physical address the person worked at must be within the state of Texas.*
- *The company must have 15 or more employees.*
- *The date of discrimination must have occurred within the last 180 days from the date of submission of the complaint.*
- *The discrimination allegation must specify one or more of the following types: race, color, national origin, religion, sex, age or disability.*
- *The complaint must identify employment harm such as demotion, denial of promotion or termination.*

In addition, the per Tex. Gov't Code §657.008, the Comptroller creates a Veteran Workforce Summary Report and Veteran Compliant Reporting. The complete fiscal year Veteran Workforce Summary Report includes the number of complaints received and complaints resolved relating to veteran employment decisions. More information on the report can be found online at

<https://fmxcpa.texas.gov/fmxc/payper/vet/>. The report is based on data that agencies and institutions submit to one of the following Comptroller systems:

- *Human Resource Information System (HRIS)*
- *Standardized Payroll/Personnel Reporting System (SPRS)*
- *Uniform Statewide Payroll/Personnel System (USPS)*

5. IMPROVE ACCESS TO MENTAL AND PHYSICAL HEALTH RESOURCES

5a. Support for Veterans to use Physical Health and Mental Health Resources

The first health recommendation received from the public was implementing or expanding a peer-to-peer support network for Veterans mental health support.

The second health recommendation received from the public was to create incentives or motivations for Veterans to enter rehabilitation programs. Some Veterans are unwilling to join rehabilitation programs due to stigma.

The third health recommendation received from the public was to work to change the mindset of Veterans experiencing homelessness who get complacent with the dysfunctional, but familiar, life of homelessness.

The fourth health recommendation received from the public was to address the violence and victimization that the Veteran experienced while homeless, as well as post service-related trauma.

Considerations: The Texas Military Veteran Peer Network (“MVPN”) is a robust, continuously growing and evolving department within the TVC. The MVPN mission is to establish camaraderie and trust with each other, identifying and vetting community resources and, collectively, contributing to the communities in which veterans live. It currently has 39 chapters throughout the state and continues to grow.

MVPN provides peer to peer training for volunteers who may be veterans, family members of veterans or community members. The organization connects veterans and their families to local, state and national resources through an active group of veteran peers. Professionals and para-professionals work to provide and/or refer veterans to appropriate services or benefits related to health and mental health, homelessness, suicide prevention, employment, education and other areas.

Discussion at the TICH meeting included that Veterans who do not qualify for medical services at the VA should be served at the state level. In addition, Veterans should be identified during medical assessments so that the most appropriate level of physical or mental health assistance could be obtained by either state or federal sources.

The TICH also discussed using more Veterans as physical and mental health care professionals. Veterans may have the training to provide physical and mental health care, but not the degree or certifications. A job comparison could be made with these Veterans to provide these services due to military experience.

The fear of stigmatization possibly resulting in loss of employment, criticism of friends, members of the community, family members and others, may prevent a veteran in need of mental health services from seeking them. Texas has a strong network of state agencies, non-profit and faith-based organizations and individuals that has developed outreach efforts, counseling facilities located away from locations that

would clearly indicate its mental health treatment. These partners work with Veterans organizations, local mental health authorities, the Texas National Guard Family Support Services Branch and all veteran-associated entities to provide outreach and information that will enable veterans needing assistance to seek it without fear of being identified.

Homelessness among the veteran population has many causes including inability to secure a job, loss of employment, mental health issues, lack of education or training to become gainfully employed following their service. There is a growing number of homeless women veterans and both female and male veterans with children.

5b. Access to Physical Health and Mental Health Resources

The fifth health recommendation received from the public was to make sure Veterans had access to both short- and long-term treatment options. In addition, another recommendation from the public was to increase the length of time that treatment options were available if the Veteran needed additional help.

Considerations: New legislation, H.B. 19, requires and provides provisions for the statewide coordination of mental health programs for veterans through the TVC and the Department of State Health Services to coordinate and administer the mental health program for veterans that will provide training to volunteer coordinators and peers, provide technical assistance to volunteer coordinators and peers, recruit, train and communicate with community-based therapists, community-based organizations and faith-based organizations and to coordinate services for justice-involved veterans.