

Comments on VCH 2014 Annual Report and 2015 One-Year Action Plan 2015

Comment period May 2nd through May 30th

Lynne Klamm:

Hi Angus

Happy Friday! Here are my brief comments on the VCH Action Plan:

Page 3- date typo; change January of 2013 to January of 2014

Regarding Strategy #1: It would be great if somewhere we could introduce the concept of regional housing plans that would include ELI housing; perhaps even reaching out to non-traditional partners like Regional Planning offices. It might shift our thinking away from looking at housing in cities and towns to really looking at what we need regionally, where we need and how we can share both the resource and the associated services.

Regarding Strategy #2: To piggyback on above, can we work on flexibility between funding sources as well as sharing resources? I know that HUD is pretty rigid in terms of their funding parameters, but we all know that they don't work that well in our mostly rural state. I'm not really sure how to do this except maybe by introducing the concept as frequently as possible!

Thanks. Have a great weekend.

Response: Fixed date error. Strategy 1, new action item e speaks to local plans. Added reference to ELI housing. Progress section speaks to challenges between flexibility and uniformity.

MaryEllen Mendl :

Page 9 – “Vermont’s most recent Point in Time count, conducted in January **2013**, estimates that on any given winter night 1,556 Vermonters are homeless.” Good report!

Response: Corrected date to reflect 2014.

Morgan Brown:

Add definitions for “ELI” and “LIHTC”

Response: Adopted both suggestions.

Margaret Bozik:

Dear Angus:

Thank you for the opportunity to submit comments on the Annual Report and one-year Action Plan for 2015. The Champlain Housing Trust is submitting the following comments on Strategy 1:

Development subsidies are key to increasing the overall availability of rental homes, something which we certainly experience daily as a pressing need in Chittenden County. We receive, on average, close to 150 applications for rental housing each month with, on average, five to ten vacant units available. However, increasing the supply – even when coupled with incentives under the Low Income Housing Tax Credit program for homeless set-asides – will not make more units affordable to people who are extremely low-income.

Looking at screening processes and addressing barriers such as bad rental and credit histories are also important to increasing the availability of rental units to those who are homeless. For example, through our Ready, Set Rent program over the last three years, we have housed 177 households, half of whom who were homeless or at risk of homelessness, who would otherwise have been denied housing because of their credit histories. But again, increasing the availability of rental units doesn't make more units affordable to extremely low-income tenants.

Rent affordability at that income level requires rental subsidy – which, as you rightly point out, is shrinking on the federal level. The creation of the Vermont Rental Subsidy Program was an excellent tool with which to address the affordability issue. The state's 811 application will also, hopefully, help to make additional subsidy resources available – and the proposed mechanism for identifying and housing people with those subsidies is a good example of coordination between housing and supportive service agencies. We believe, however, that Vermont can be even more creative in addressing the affordability issue. We urge you to add the exploration of additional subsidy mechanisms as an action item. One such possibility is to follow the New York model of using Medicaid savings to fund not only services for the high-cost chronically homeless, but also rental subsidies. We know that discussions around that possibility are ongoing, and believe that it is important to acknowledge such efforts under the umbrella of an explicit action item.

Best,

Margaret Bozik

Associate Director of Asset Management

Champlain Housing Trust

Response: Added action item f under strategy 1: “Explore additional subsidy mechanisms, such as Medicaid, to increase affordability.” Added additional references to targeting rental assistance to people below 30% of AMI. Added reference to the need for “operating subsidies.”

Brian Smith:

Angus.....

Please consider the information below as a formal comment for the action plan

“The State of Vermont Department of Mental Health (DMH) has embraced the evidence based housing first approach as a tool to assist in ending chronic homelessness. Pathways to Housing VT has been given conditional Specialized Service Agency provider status by DMH so they can bill Medicaid for services to support homeless mentally ill clients.”

Response: Added comment as an update to Strategy 3.

Linda Ryan:

Hi Angus,

The National Low Income Housing Coalition focused more on housing the lowest income this year at their annual conference in DC. Sheila Crowley, Director of NLIHC, and her Board, suggested that states use the National Housing Trust Fund money to help end homelessness and to focus on the state's Plan to end Homelessness.

Everything I heard was suggesting targeting individuals and families with incomes below 30% AMI. This may be a way to focus on priority #1 of our State's plan, as well as other initiatives that target those below 30%.

Sheila was also concerned that the Tax Credit projects were using Housing Choice Vouchers in their low income units. She seemed to think that those projects should be making those units affordable without using up vouchers.

We should form a group soon to begin developing a plan on how to best use the Housing Trust Funds if and when the bill gets passed. I would like to be part of that group.

Thanks,

Linda

Response: Added section to strategy 1 speaking to National Coalition, Housing Trust Fund and targeting to persons below 30% AMI. Emphasized 30% AMI throughout.

Sarah Carpenter:

Introduction: Add “ELI” to strategy 1.

Response: Added ELI to strategy 1.

Use “individualized” instead of “voluntary” in strategy 3.

Response: Clarified intent of strategy 3 by substituting “individualized” for “voluntary.”

Strat 1: Edits to action items I and ii.

i. *Develop the foundation of a housing production and preservation strategy which would include regular discussions between housing providers and supportive service agencies to discuss how best to implement this strategy, including determining who can be served for whom the housing would be created, where, and how to fund development and ongoing operations.*

Response: *Did not add “preservation” to strategy 1, action item i because Vermont already has an excellent preservation strategy and work group did not want to dilute intent around production. Added language on “providers” and “need for development and ongoing operations.”*

ii. *Set goals for a multi-year housing strategy to increase housing for people who are homeless. This should be both statewide and at the local level, and should specifically prioritize where and what type of housing is needed.*

Response: *No change to emphasize state and local here. This is articulated in new action item e.*

Progress and Challenges – comments on data for progress metrics. Added *“What are target rents and incomes for these units”*

Response: *Did not add greater detail on target rents and incomes. While this is important, it feels too detailed for this document. The plan emphasizes the 30% AMI income throughout.*

Vermont has not set overall ~~production~~ housing goals to serve the homeless, though individual programs such as LIHTC have incentives that may achieve similar objectives. In light of sequestration and its impact on federal funding to support the development or preservation of affordable housing and operating subsidies, developers are reluctant to set targets without dollars attached.

Response: *Added “housing” and did not remove “production.” Added: “...targeted to address homelessness.” Adopted suggestion to add reference to operating subsidies.*

New action item iii: *Suggest future conversations engage non-profit housing providers around screening processes and supports needed to offer housing to homeless households with barriers to receiving and retaining housing. Ask housing providers to provide data on vacancies and profiles of new tenants.*

Response: *Suggestion around barriers is covered in strategy 3. Adopted suggestion on asking for information on vacancies. Did not adopt suggestion around “profiles” of new tenants as that would generate concerns around what level of information would be gathered and how it would be used.*

Strat 2: Edit to action item v: *“Discuss and work on implementation timeline for ~~Report~~ the drafted standards with to community partners for discussion.”*

Response: *Kept language intact. Council should determine process details in the coming year.*

Strat 3: Edit to action item iii: *“Talk with housing providers about what their needs the first year and after supportive services end during a lease term.”*

Response: *No issues with proposed language but elected not to change as surveys have already been conducted and this would seem to change scope retroactively.*

Section III. Add a bullet on income information.

Response: *This level of detail not available through the PIT count.*