December 12, 2014

Acting Assistant Secretary Jemine Bryon Public and Indian Housing (PIH) Department of Housing and Urban Development 451 7th Street, S.W. Washington, D.C. 20140

Dear Acting Assistant Secretary Jemine Bryon,

The undersigned organizations would like to commend HUD's initiative to encourage housing providers to make financial literacy tools and asset building programs available to residents served through HUD's programs. PIH Notice 2014-26 provides PHAs and Multifamily Housing owners many resources that are aimed to help low income households enhance their financial knowledge through educational training and coaching; accessing safe and affordable financial products; and promoting savings and improving self-sufficiency.

Our organizations are working in different communities across the country seeking to improve the lives of residents in HUD assisted housing. Housing stabilization is not the end goal for our organizations; instead it's the starting point to help individuals and families improve their lives. As communities across the country are continuously reducing the number of homeless individuals and families on the street, it is critical that the housing field moves "beyond the key" to help these higher need populations become economically stable and self-sufficient.

PHAs are increasingly serving higher-need populations, such as homeless individuals with physical or mental disabilities, youth that have aged out of the foster care system and homeless veterans. It is critical that these populations also have access to financial training and education programs being provided to other residents in assisted housing.

Often harder to serve populations are unintentionally excluded from programs to enhance economic opportunities because of how the programs are structured, marketed and outcomes are measured. Further complicating participation in these programs can be limited coordination between the various housing programs or systems that are serving higher-need populations in a community. Finally, PHAs have limited resources to develop programs tailored to assist their residents, train and hire specialized staff or coordinate between the various systems (local CoCs, Workforce Investment Boards, health services). This can result in housing providers focusing largely on housing stabilization services and not going "beyond the key," to help higher need populations become more self-sufficient once stabilized.

HUD highlighted two PHAs that were coordinating their HUD-VASH program with their Family Self Sufficiency (FSS) program in the "HUD-VASH Best Practices-Version 1.0." The document showcased effective practices that the Housing Authority of the City of Long Beach and Cecil County Housing Agency were using to enroll HUD-VASH recipients into the FSS program. It was clear that a higher level of engagement that was needed from both the FSS coordinator and VA case manager to assist the client successfully. HUD notes that "it is clear that HUD-VASH and FSS are mutually beneficial and the gains made the Veterans are enhanced and accelerated when the two programs are linked." We encourage HUD to look at other ways to link not just the FSS program, but other service programs that focus on financial education and literacy to assist the higher-need populations being served through PHA assistance. Through HUD's authority to provide technical assistance for a broad range of activities, HUD should commit to developing guidance materials, tools and trainings to assist PHAs and private housing providers to increase utilization of services and programs to help high need populations become more economically stable and self-sufficient.

Looking beyond housing stabilization is critical to help improve the lives of vulnerable populations. We strongly encourage HUD to work with internal program staff and with external stakeholders to identify best practices serving high-need populations, the resources necessary to develop economic opportunity programs and carry-out economic opportunity programs for higher need populations by PHAs and private housing owners.

Sincerely,

Compass Working Capital Community Solutions Communities for Veterans Consortium for Citizens with Disabilities-Housing Task Force Council for Large Public Housing Authorities CSH Habitat for Humanity International Housing Partnership Network National Housing Conference National Center for Housing and Child Welfare National Coalition for the Homeless Mercy Housing, Inc. Project Community Connections, Inc. Rebuilding Together, Inc. REDF Volunteers of America Will Cooper, Sr.

CC: Acting Deputy Assistant Secretary for Special Needs Ann Oliva, Acting Deputy Assistant Secretary Danielle Bastarache and Senior Advisor on Housing and Services Jennifer Ho