

Attachment B

Ensuring “No Place Like Home” (NPLH) eligibility for persons living with mental health and substance use conditions

Existing statutory language for the NPLH initiative establishes eligibility for recipients of housing constructed with NPLH funding. The language concerning eligibility contains within it the HUD definitions for “chronically homeless” and “homeless”, which do not take into consideration situations in which someone becomes homeless as a result of being admitted to an institution such as jail or a hospital, or a treatment program that includes overnight accommodations. In order to be considered “chronically homeless” or “homeless” before being discharged (in this case to the streets) the individual would have had to have been homeless prior to admission/booking, etc. We know of situations in which individuals who have lost their housing as a result of spending as little as one night in an institution, and in order to be deemed homeless or chronically homeless have had to spend at least one night on the streets, even when it was known they would be homeless upon discharge/release.

These definitions also include a 90-day provision in which a person who was considered homeless prior to entering an institution would no longer be considered homeless once they had spent 90 days in that institution. They would have to spend at least one night on the streets to once again be considered homeless. Furthermore, anyone who was considered to meet the definition of “chronically homeless” prior to entering the institution would lose their “chronically homeless” status after 90 days in an institution, thereby limiting their access to housing funded by NPLH absent regulatory language that would address this problem.

We believe both of these scenarios cause unnecessary breaks in care, place people in jeopardy and limit their housing opportunities upon discharge.

We believe that the following suggested language addresses both issues.

5849.2. As used in this part, the following definitions shall apply:

(a) “At risk of chronic homelessness” includes, but is not limited to, persons who are at high risk of long-term or intermittent homelessness, including persons with mental illness exiting institutionalized settings, including, but not limited to, jail and mental health facilities, who were homeless prior to admission, transition age youth experiencing homelessness or with significant barriers to housing stability, and others, as defined in program guidelines.

We recommend that HCD utilize the following language for “others” in NPLH regulations:

Individuals that have no fixed domicile upon discharge and/or release from an institutional facility and/or residential treatment program including; Crisis Residential Treatment, Transitional Residential Treatment, board and care facility, Mental Health Rehabilitation Center, Skilled Nursing Facility, Institute of Mental Disease, Psychiatric Health Facility, transitional housing placement, mental health shelter, jail or prison. Additionally, those individuals who have a history of housing insecurity and have been given notice in writing to move from their existing housing.