HOUSING FIRST AND HOMELESSNESS: THE RHETORIC AND THE REALITY

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About the Author



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Executive Summary

Over the past two decades, a policy known as "Housing First" has come to dominate the government response to homelessness. Housing First has two chief tenets: (1) the most effective solution to homelessness is permanent housing; and (2) all housing for the homeless should be provided immediately, without any preconditions, such as sobriety requirements. The movement to "end homelessness," in which hundreds of communities have participated, is centered on the implementation of Housing First.

More recently, the Trump administration has begun modifying the federal government's commitment to Housing First. These changes have been prompted, in part, by the fact that, in California and elsewhere, community efforts to end homelessness have failed even to arrest its increase. Though the changes thus far have been modest, they have been strenuously criticized by advocates who sense a weakening in the Housing First consensus.

This report contributes to the debate over homelessness policy by assessing Housing First's rhetoric—the claims made by proponents—in light of the available evidence. It argues that proponents overstate the ability of Housing First to end homelessness, the policy's cost-effectiveness, and its ability to improve the lives of the homeless.

Key Findings

- Housing First has not been shown to be effective in ending homelessness at the community level, but rather, only for individuals.
- A Housing First intervention for a small segment of "high utilizer" homeless people may save taxpayers money. But making Housing First the organizing principle of homeless services systems, as urged by many advocates, will not save taxpayers money.
- Housing is not the same as treatment. Housing First's record at addressing behavioral health disorders, such as untreated serious mental illness and drug addiction, is far weaker than its record at promoting residential stability.
- Housing First's record at promoting employment and addressing social isolation for the homeless is also weaker than its record at promoting residential stability.

Recommendations

- The U.S. Department of Housing and Urban Development should allow more flexibility from Housing First requirements for communities pursuing homelessness assistance grants through the "Continuum of Care" (CoC) program.
- State and local Housing First mandates should be reassessed.
- The homelessness debate should be reintegrated into the safety-net debate.

HOUSING FIRST AND HOMELESSNESS: THE RHETORIC AND THE REALITY

I. History of Housing First

In response to the emergence of "modern" homelessness in the early 1980s, cities first focused on developing emergency shelter programs. Shelter was emphasized in those years because the rise in homelessness was assumed to be a temporary crisis created by the 1980–82 recession, and, going back to the 19th century, temporary housing had always been part of the response to housing instability challenges. Throughout the 1980s and 1990s, however, the economy improved but homelessness did not decline; in some cities, it increased. Policymakers thus began to reason that a new response was required to meet this new, and apparently structural, socioeconomic challenge.

The first proper homeless services system—as distinct from the preexisting array of safety-net programs and services—is often described as having had a "linear" character.² Housing programs for the homeless would be arranged in a continuum of emergency, transitional, and permanent options. Linear-style systems would guide clients out of homelessness gradually, first from the streets to shelter, then to a service-enhanced transitional housing program, and then to permanent housing, either publicly subsidized or private.³ It was always understood that at least some of the homeless population would need permanent housing benefits—meaning a rental subsidy not subject to any time limits. But the most troubling cases, such as individuals who were mentally ill or had drug addictions, would need services in addition to housing benefits, both for their sake and to ensure the success of the housing intervention.⁴

The linear system was developed during the lead-up to the 1996 welfare reform, the Personal Responsibility and Work Opportunity Reconciliation Act. The same concerns about changing public assistance programs to promote self-sufficiency and minimize dependency also shaped the debate over the early 1990s homeless services system. A 1994 strategic plan by the United States Interagency Council on Homelessness (USICH) to "break the cycle of homelessness" began with an epigraph by President Bill Clinton about how "work organizes life" and, in detailing the purpose of housing programs for the homeless, placed high emphasis on "mak[ing] housing work again." With so many people cycling between the streets, shelter, and unstable housing arrangements, a welfare reform—style emphasis on work would overcome homelessness recidivism.

Policymakers in the early 1990s were also concerned about the flaws of deinstitutionalization. Transitioning the public mental-health-care system from an inpatient to a mainly outpatient model began in the 1950s, and it proceeded at an especially rapid pace during the 1970s. Deinstitutionalization's promise of "better care in the community" had been undermined by the spectacle of mentally ill individuals living on the streets who were either former patients in mental hospitals or people who would have been committed to long-term psychiatric care in earlier times. The homeless mentally ill needed not only housing but "structured care and residential support" similar to what had existed in the state hospitals. To correct the mistakes of the past, the homeless mentally ill would need a variety of levels of support, depending on what stage they were at in their psychiatric rehabilitation.

The "linear" character also applied to programs designed to help homeless populations that faced substance abuse, unemployment, and other challenges that had contributed to their homelessness. Heavy focus was placed on the transitional housing model. Transitional housing provides temporary housing, like shelter, but for a longer

duration—up to 24 months—and in a more service-enhanced environment. Housing was considered part of an overall effort to repair broken lives and address the problems that caused or strongly contributed to clients' homelessness. 11

Press reports and advocates of Housing First often use the phrase "housing readiness" to describe the aim of linear programs. But housing readiness, while certainly used by some participants in the 1990s debate, 12 was not, in every case, how linear-style service providers themselves characterized their ultimate aims. Whereas Housing First providers hold themselves, most of all, to the standard of residential stability—keeping the most clients housed for the longest period—linear-style programs often viewed residential stability as secondary to larger goals of independence or health. Much like how residential treatment programs use temporary housing as a means toward the goal of sobriety, transitional housing providers always aimed at goals beyond mere residential stability.¹³ This is why some have described the debate between the two approaches as one of different "paradigms"—the dispute concerns not just the best way to achieve a mutually agreed-upon goal but a dispute over which goals to pursue.¹⁴

The groundwork for Housing First was laid in the late 1970s, when advocates began promoting the term "homelessness," a term that previously had never been widely in use, to pressure governments to develop more subsidized housing. 15 The belief in housing as a human right—meaning that government is obliged to provide it for anyone who cannot find housing on his own—had many adherents in advocacy circles but was antithetical to the notion of preconditions for housing benefits. 16 Housing First advocates were influenced by the "recovery model," an approach to mental health that stresses the importance of letting mentally ill people choose their care and treatment regimens.¹⁷ Criticisms that, decades earlier, had been leveled at the traditional asylums by Erving Goffman and others were revived and directed at the linear homeless services system. 18 Housing First advocates believed that linear programs did more to undermine independence than promote it, by placing the homeless in what they viewed as a quasi-institutional living environment. Theories of "community integration" called for decoupling housing benefits and social services for mentally ill clients. 19 Instead of transitional housing, they called for "supported" or "supportive" housing, which generally meant subsidized housing that made services available to tenants but did not require participation or have any other requirements.²⁰

These concepts—housing as a human right, the imperative of personal autonomy, even for those with un-

treated serious mental illness, and community integration—were developed in academic articles in the 1990s and formed the theoretical basis for Housing First.

The empirical basis was developed by Sam Tsemberis, a New York-based clinician who founded Pathways to Housing in 1992. Pathways placed its mentally ill clients, all formerly homeless or at serious risk of homelessness, in scattered-site supported housing units without any preconditions. Tsemberis then did studies, including a rigorous randomized-controlled trial, on their rates of residential stability. He found that, of a pool of individuals suffering from serious mental-health disorders, clients placed in Pathways units stayed stably housed at higher rates than those placed in linear-style programs.²¹

In 2000, the National Alliance to End Homelessness launched the campaign to end the problem in 10 years. "People should be helped to exit homelessness as quickly as possible through a housing first approach," the organization proclaimed. "For the chronically homeless, this means permanent supportive housing (housing with services)—a solution that will save money as it reduces the use of other public systems. For families and less disabled single adults, it means getting people very quickly into permanent housing and linking them with services. People should not spend years in homeless systems, either in a shelter or in transitional housing."²²

This campaign quickly found an ally in the George W. Bush administration, whose secretary of the Department of Housing and Urban Development, Mel Martinez, was the keynote speaker at the 2001 annual meeting of the National Alliance to end homelessness.²³ Under the leadership of USICH executive director Philip Mangano, the Bush administration began the "Chronic Homelessness Initiative," which encouraged states and localities to create 10-year plans to end chronic homelessness.24 (Though the formal requirements for "chronic" homeless status have changed over time, the term generally means someone whose experience of homelessness is long-term and who suffers from a disability.) It has been estimated that more than 350 states and localities endorsed, in some fashion, the goal of ending homelessness through a Housing First approach.²⁵ California, host to the largest homeless population of any state, made Housing First a requirement for state-funded homelessness programs in 2016.²⁶

The Obama administration put out a strategic plan to end homelessness in 2010 (updated in 2015).²⁷ USICH assumed responsibility for defining what it would mean to "end" homelessness and for validating claims made

FIGURE 1.

HUD's Homeless Assistance Grant Program, 2005–18

	Permanent Supportive Housing Award	Share of Total Grant	Transitional Housing Award	Share of Total Grant
2005	\$595,483,232	50%	\$417,439,417	35%
2006	\$617,611,791	51%	\$415,335,530	34%
2007	\$727,119,842	55%	\$435,684,534	33%
2008	\$782,671,147	55%	\$435,501,349	31%
2009	\$926,779,901	59%	\$428,789,845	28%
2010	\$996,554,318	61%	\$430,421,319	26%
2011	\$1,040,824,807	62%	\$430,229,366	26%
2012	\$1,027,500,308	61%	\$417,457,781	25%
2013	\$1,132,624,508	67%	\$371,494,431	22%
2014	\$1,240,437,375	69%	\$325,548,173	18%
2015	\$1,407,021,020	72%	\$172,252,643	9%
2016	\$1,434,271,450	73%	\$108,067,486	6%
2017	\$1,496,858,863	74%	\$80,669,446	4%
2018	\$1,542,451,024	71%	\$66,342,036	3%

Source: HUD, Continuum of Care Program. Numbers do not add up to 100% because permanent supportive housing and transitional housing are not the exclusive uses of those funds.

FIGURE 2.

Permanent Supportive Housing (PSH) vs. Transitional Housing (TH) Units, 2005–18



Source: HUD, CoC Housing Inventory Count Reports

by communities that they had "ended" homelessness for some cohort, such as the chronic or veterans' population. Targeting resources toward specific homeless cohorts was seen as beneficial in itself and, if successful, a source of proof that ending homelessness, broadly speaking, was achievable.²⁸

HUD is the most important agency in federal homelessness policy because of its responsibility to disburse billions in funds for homelessness programs to states and localities. Over time, the federal government has tightened adherence requirements to Housing First for local agencies pursuing homeless assistance funds from HUD. **Figures 1** and **2** show how this has led to a dramatic shift in support from transitional housing programs—closely associated with the linear approach—to the permanent supportive housing programs favored by Housing First—oriented systems.

The Trump administration, despite departing from the Obama administration on several safety-net and poverty-policy questions, remained focused on Housing First for its first two and a half years in office. Six months into the new administration, 23 Republican congressmen sent a letter to HUD secretary Ben Carson, asking him to review his agency's "current procedures" that follow Housing First principles and to "end the recommended scoring guidelines that currently punish programs that prioritize work, education, and sobriety."29 Much federal funding for homeless services flows through the Continuum of Care (CoC) grant competition, which is structured around a points system and set of criteria laid out by HUD.³⁰ In its response letter, HUD asserted that Housing First was an "evidence-based" practice and argued that its current approach was not unduly burdensome on local autonomy.31 Carson and other prominent administration officials have made many public statements in favor of Housing First. 32 Most critically, HUD's Notice of Funding Availability (NOFA), the annual document that lays out requirements for access to billions in CoC program funds, kept in the Obama-era language regarding Housing First.

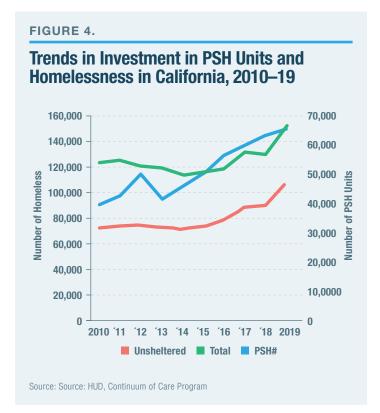
In summer 2019, the Trump administration began to signal a shift. The first notable change came in the 2019 NOFA, which "Provid[ed] Flexibility for Housing First with Service Participation Requirements." In the section "CoC Coordination and Engagement" (VII.B.1 in the FY18 NOFA, VII.B.6 in the FY19 NOFA), the seven points allocated for embracing "Housing First" were, in FY19, dedicated to "Low Barriers to Entry" (**Figure 3**). The intention of the change was for localities to discourage service providers from attaching sobriety requirements or other preconditions to clients' initial entry into a federally funded housing program but allow for their usage in clients' ongoing participa-

FIGURE 3.

Housing First–Relevant Language in the FY18 and FY19 NOFAs

At least 75 percent of all project applications that include housing activities (i.e., permanent g. Housing First. Uses a Housing First approach. Any housing, transitional housing, and safe haven) submitted under this NOFA are using the housing project application Housing First approach by providing low barrier projects that do not have service participation that indicates it will use requirements or preconditions to entry and prioritize rapid placement and stabilization in **FY18** a Housing First approach, permanent housing. This means the projects allow entry to program participants regardless of (7 Points) that is awarded FY 2018 their income, current or past substance use, history of victimization (e.g., domestic violence, CoC Program funds will be sexual assault, childhood abuse), and criminal record-except restrictions imposed by federal, required to operate as a state or local law or ordinance (e.g., restrictions on serving people who are listed on sex Housing First project. offender registries). g. Low Barriers to Entry. CoCs must demonstrate at least 75 percent of all project applications that include housing CoC Program-funded activities (i.e., permanent housing, transitional housing, and safe haven) submitted under this projects in the geographic NOFA use the following practices: area have low barriers to provide low barriers to entry without preconditions and regardless of their income, current or entry and prioritize rapid past substance use, history of victimization (e.g., domestic violence, sexual assault, childhood **FY19** placement and stabilization abuse), and criminal record—except restrictions imposed by federal, state, or local law or (7 Points) in housing. ordinance (e.g., restrictions on serving people who are listed on sex offender registries), and prioritizes rapid placement and stabilization in permanent housing The use of service participation requirements after people have stabilized in permanent housing will not affect the score on this rating factor.

Source: HUD, "Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2018 Continuum of Care Program Competition," June 20, 2018, p. 53; "Notice of Funding Availability (NOFA) for the Fiscal Year (FY) 2019 Continuum of Care Program Competition," July 3, 2019, pp. 63–64



tion in programs.

In late 2019, prompted by advocates,³⁴ Congress re-

quired HUD to return to the FY18 language for the 2020 NOFA.³⁵ In the meantime, the Trump administration has been active in questioning Housing First on other fronts. In September 2019, the Council of Economic Advisers (CEA) released a comprehensive report on homelessness policy in America that included a critical discussion of Housing First's limitations.³⁶ In December, a new USICH executive director was appointed, Robert Marbut, an adherent of the older, linear approach ("I believe in Housing Fourth").³⁷

The Trump administration has pursued these changes partly because of philosophical objections to the Housing First philosophy but also because so many communities that participated in the campaign to end homelessness, such as Los Angeles and San Francisco, are now dealing with crises of unprecedented magnitudes. The failures of California jurisdictions' 10-year plans to end homelessness in some form have been covered in a number of press outlets.³⁸

California is host to approximately one-fourth of the nation's total homeless population and half of the nation's total unsheltered population. Since 2010, California has added more than 25,000 PSH (permanent supportive housing) units, an increase of about two-thirds (**Figure 4**)—yet the state's unsheltered homeless population, over the same span, increased by half. The public has registered support

for investing in homeless services, through successful initiative campaigns, but continues to voice concern over the direction of policy in opinion surveys.³⁹ This has inevitably raised questions about the Housing First approach that has been in place through this recent rise in homelessness. Therefore, now is a good time to take stock of Housing First. How effective has Housing First been? Does it deserve the wide acclaim it has received from advocates?

II. "We Know How to End Homelessness"

Housing First has evolved somewhat.⁴⁰ Originally, it was associated with providing permanent supportive housing for the chronically homeless. That remains a core priority of Housing First-oriented homeless services systems, but, more recently, USICH and advocates have encouraged governments to view Housing First as a "whole system orientation." 41 All homeless services, for all homeless populations, temporary and permanent housing alike, are expected to conform with the Housing First philosophy. In addition to expanding permanent supportive housing, the top priority of any Housing First system, emergency shelter should also be provided without any barriers (see, for example, San Francisco's Navigation Centers, Los Angeles's Bridge program, and New York City's Safe Haven shelters). 42 "Rapid Rehousing"—short-term rental assistance to be used for a private apartment—is also seen as part of a Housing First-oriented homeless services system, though it is a temporary benefit.⁴³ So, too, is providing standard affordable housing understood as subsidized housing without any time limits—to non-chronic homeless clients, such as families, as long as it is provided without any barriers.⁴⁴ Housing First systems work to "align" or "integrate" existing affordable housing programs with homeless services, meaning, for instance, preferential access for the homeless for Section 8 vouchers or newly developed affordable housing units.⁴⁵

Proponents argue for organizing homeless services systems around the principle of Housing First based on scientific evidence, not only, or even mainly, because it is founded on more just or humane principles. In their view, Housing First has been "proven" or "demonstrated" to be superior to alternatives and to be able to end homelessness. ⁴⁶ In most instances, when a policymaker is making some claim about how "we know how to end homelessness," ⁴⁷ they are referring to the social science evidence base behind Housing First.

At their core, these claims are based on studies that have registered high rates of residential stability when homeless individuals, or people at serious risk of homelessness, have been placed in permanent supportive housing units under a Housing First policy. Residential stability may be measured in terms of how many days someone spends in his unit over a particular period, or whether he still occupies his unit at a certain time benchmark.⁴⁸

The "gold standard" in social science research is the randomized-control trial (RCT). In an RCT, researchers examine the effect of some intervention on two different cohorts who are similar in every important respect. Though the literature on Housing First is significant, the number of truly rigorous RCT studies of the approach is relatively small. One 2015 review credits only four, with several more studies having a "quasiexperimental" design. 49 A 2014 survey identified seven RCTs and five "quasi-experimental" studies.⁵⁰ A 2017 survey of the literature credits 14 RCTs, based on 12 trials. 51 The best-known RCTs are the Pathways studies discussed earlier and the more recent At Home / Chez Soi, which encompassed five Canadian cities and more than 1,000 participants. One common criticism of the literature on Housing First is that studies often relate few details about the programs under examination (a significant concern for a policy that advocates are trying to scale up and expand nationwide).⁵²

Still, despite certain limitations, the Housing First literature has demonstrated that Housing First interventions tend to yield high rates of residential stability.⁵³ The rates of residential stability are often in the 70%-80% range, for the length of the trial, which typically lasts a couple of years. "Usual care" or "treatment first" comparison groups, by contrast, often register rates below 50%. And, to reemphasize, these studies typically involved "chronic" homeless cases suffering from serious mental illness or some other behavioral health disorder. Whether looking at how many days housed as the measure of residential stability, or how many participants remained in housing at the end of the study, Housing First-style interventions have demonstrated real strength at addressing homelessness.

While it may have been the case 30 years ago that homeless policymakers doubted whether people with untreated serious mental illness and other social challenges could hold on to their housing if those challenges were not addressed first, there is less doubt about that point now. This is the thinking behind claims about how the Housing First literature "proves" how to "end homelessness."

The ability of Housing First programs to keep the homeless housed at a higher rate than linear-style programs has been acknowledged by, among others, the Trump administration's CEA.⁵⁴ The Trump administration also acknowledges that homelessness is, in large measure, a housing problem.⁵⁵ Any community that experiences a shortage of rental units affordable to low-income households will, all other factors being equal, experience higher levels of homelessness than communities with a larger store of such units.⁵⁶ Nor is there serious dispute that some of the homeless population, such as those with serious mental illness, will need rental subsidies for the rest of their lives.

But claims that Housing First has been shown to end homelessness elide the distinction between evidence at the individual level and the community level. Housing First advocates' rhetoric that investing in permanent supportive housing will end homelessness raises hopes of ending homelessness at the community or national level. For example, Los Angeles County's Measure HHH,⁵⁷ which authorized \$1.2 billion in bonds to build thousands of permanent supportive housing units, had the working title "Housing and Hope to End Homelessness." However, as noted above (Figure 4), California's experience has been increased investment in permanent supportive housing and increased homelessness. Given that, according to advocates, hundreds of localities have adopted Housing First, one might have expected at least a handful of examples of communities where Housing First has eliminated or drastically reduced homelessness in a manner noticeable to the broader public. That has not been the case.

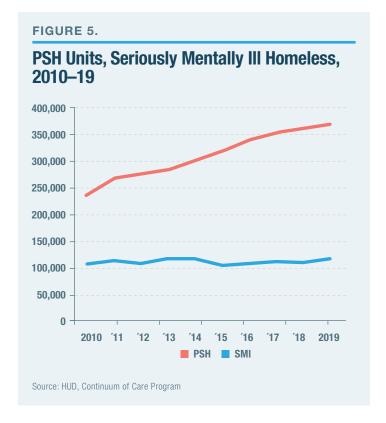
Scholars who have studied the community-level effects of increased investment in permanent supportive housing have found that: (1) governments may need to create as many as 10 units of permanent supportive housing in order to reduce the local homeless population by one person;⁵⁸ and (2) a certain "fade-out" effect is observed whereby the reduction is only temporary. There is no scholarly consensus as to the weakness of Housing First on community-level rates of homelessness. But it does show that scholarship conforms to people's experiences: more investment in PSH does not necessarily lead to less homelessness.

As noted, many participant communities in the campaign to end homelessness have targeted a specific cohort, such as the chronic homeless or veterans. Utah⁵⁹ is perhaps the most touted success story from the campaign to end homelessness. But in a 2015 study, economist Kevin Corinth showed how claims about Utah's "ending" homelessness can mostly be ascribed to methodological changes and shifting definitions of "chronic" status.⁶⁰ In 2009, Utah adjusted its "point-in-

time" homeless numbers to reflect only the homeless who were counted on a certain day in January, instead of an "annualized" estimate to reflect all homeless throughout the year, and abruptly ceased including transitional housing clients in its count of sheltered "chronic" homeless. Nonetheless, media and public officials continue to tout Utah as a case study in how to end homelessness via Housing First. 61 (USICH does not currently list Utah or any of its localities among the communities that have "ended" chronic homelessness.)⁶² Even when the definition of "chronic" homelessness is settled, the number of chronic homeless will always face the challenge of counting the unsheltered population. Counting the unsheltered and documenting their challenges, such as what disabilities they suffer from and how long they have been on the streets, are tasks that continue to be plagued by a range of methodological difficulties that quite possibly will never be resolved.

Problems with data and definitions are one reason for giving pause to claims about the success of the campaign to end homelessness. Another is that, even if homelessness has been "ended" or reduced for one specific cohort, that does not necessarily imply progress toward ending homelessness more generally. Just as many factors cause homelessness, many factors may also be at work in reducing it, such as an improving economy or demographic changes. Many sources have claimed that a recent investment in permanent supportive housing for veterans has reduced veterans' homelessness, and even ended it in some communities.⁶³ But a recent study by economist Brendan O'Flaherty demonstrated that the decline in veterans' homelessness can largely be attributed to the decline in the veteran population of the age at greatest risk of homelessness and the nationwide decline as the nation has emerged from the last recession, not to government policy.⁶⁴

The case of the seriously mentally ill, though less of a priority for USICH (no criteria for "ending" homelessness for this population have been issued),65 should also be discussed. Housing First supportive housing programs target the seriously mentally ill partly because of a commitment to helping the hardest or chronic cases, but partly because seriously mentally ill individuals qualify for disability benefits. For its influential 2004 study, Pathways to Housing recruited some participants directly from a mental hospital. Indeed, requiring, or strongly urging, supportive housing clients to participate in a money-management program is one of the few infringements on personal liberty that Housing First providers countenance.66 The number of seriously mentally ill homeless has been virtually





flat since 2010, even as the number of permanent supportive housing units nationwide has increased by more than 50% (**Figure 5**).

USICH defines what it means to "end homelessness" and also evaluates communities' claims for having done so. The council has published criteria and benchmarks for ending homelessness for four cohorts: veterans, chronic, unaccompanied youth, and families with children and, at present, has recognized about 80 communities for having "ended" homelessness for one of these cohorts. ⁶⁷

However, the official language and criteria regarding "ending" homelessness are not uncontroversial. Some have criticized it as "Orwellian."68 To give a community credit for having made homeless "rare, brief and one-time," USICH performs an assessment of that the community's services system. USICH examines system capacity, relative to need (number of homeless) but also whether that system conforms to Housing First. In other words, if the community's capacity to house the homeless—as assessed by the government—matches the number of homeless, the government says that the community has ended homelessness. But that does not mean that there are zero homeless people in the community. Ending homelessness in a community does not need to mean zero homeless people.⁶⁹

Figure 6 lists a cohort of communities that USICH currently credits for having "ended" veterans' homelessness. These communities are, according to the most recent HUD figures, host to more than 2,000 homeless veterans. Communities with modest homelessness challenges more generally are host to as few as one homeless veteran, but others estimate that hundreds of veterans are included in their homeless populations. Most of the communities recognized for having "ended" veterans' homelessness have at least seen a reduction in veterans' homelessness since 2011 (the first year that CoC-level veteran data are available), though not all. In 2019, Portland/Gresham/Multnomah County Continuum of Care, the Northwest Minnesota Continuum of Care, and Norman/Cleveland County, OK all reported higher numbers of homeless veterans than in 2011, before they "ended" veterans' homelessness.

Officials in New York and Los Angeles continue to embrace the goal of ending homelessness, as did some candidates for the 2020 Democratic presidential nomination.⁷⁰ But no community has truly ended homelessness using Housing First, and certainly not any community facing crisis-level homelessness. We would not say that a community has ended murder based upon a qualitative analysis of its police department, but rather the absence of murder. If ending homelessness must remain the goal of homelessness policy, governments should define success in a way that can be independently verified by the public. The public

can observe homelessness. It cannot easily observe and analyze service systems' capacity and competence. Thus, ending homelessness should mean the absence of homelessness, as observable to members of the public.

Brendan O'Flaherty is an economist at Columbia University and has been, for decades, one of the leading scholars of homelessness. He is known for his analysis of how housing-market dynamics account for much of

modern homelessness⁷¹ and for refuting the "Dinkins Deluge" thesis that, when New York City provided housing to shelter clients around 1990, it led, through moral hazard, to a significant increase in sheltered homelessness.⁷² In a recent review of the literature, including on Housing First, O'Flaherty came to the conclusion that "we don't know how to end homelessness. Not in the aggregate, anyway."⁷³

FIGURE 6.

Number of Homeless Veterans in Communities Recognized as Having "Ended" Veterans' Homelessness, 2019

Community	# homeless veterans in 2019
Portland/Gresham/Multnomah County Continuum of Care	473
Atlanta, GA	349
Philadelphia, PA	250
Miami-Dade County, FL	169
Long Island, NY	128
Kansas City, KS/Kansas City, MO, and Independence/Lee's Summit/Jackson, Wyandotte Counties Continuum of Care	116
Pittsburgh/McKeesport/Penn Hills/Allegheny County CoC	100
Western Pennsylvania Continuum of Care	88
Lowell, MA	45
Punta Gorda/Charlotte County, FL	43
Massachusetts Balance of State Continuum of Care	42
Cumberland County/Fayetteville, NC	38
Nebraska Balance of State Continuum of Care	31
Scranton/Lackawanna County, PA	30
Lansing, East Lansing, Ingham County, MI, Contin- uum of Care	26
Lancaster City & County, PA	21
Lincoln, NE	21

Community	# homeless veterans in 2019
Mississippi Balance of State Continuum of Care	20
DeKalb County, GA	17
Norman/Cleveland County, OK	14
Montgomery County, MD	13
Reading/Berks County, PA	13
Bergen County, NJ	13
Saint Joseph/Andrew, Buchanan, DeKalb Counties, MO, Continuum of Care	13
Northwest Minnesota Continuum of Care	9
Moorhead/West Central Minnesota Continuum of Care	9
Rochester/Southeast Minnesota Continuum of Care	9
Mississippi Gulfport/Gulf Coast Regional Continuum of Care	8
Jackson/West Tennessee Continuum of Care	8
Lynn, MA	2
Southwest Minnesota Continuum of Care	2
Northeast Minnesota Continuum of Care	2
Waukegan, North Chicago/Lake County, IL, Continuum of Care	1
Total	2,123

Source: USICH, "Communities That Have Ended Homelessness"; HUD, Continuum of Care Program

Note: This table includes every community that, as of March 2020, USICH has credited with "ending veterans' homelessness" for which HUD has homeless population data. HUD relates homelessness data on a CoC basis, and USICH has recognized, for ending homelessness, localities that are part of a larger CoC.

III. Cost-Effectiveness

One of the most famous statements in defense of Housing First came in Malcolm Gladwell's 2006 *New Yorker* article "Million-Dollar Murray."⁷⁴ This article, which the Bush administration had a hand in setting up, ⁷⁵ detailed the struggles of a "high utilizer": a man in Reno, Nevada, whose homelessness and alcoholism placed a costly burden on the local health-care and criminal-justice systems. The central claim of Gladwell's article was that homelessness was "easier to solve than to manage" because placing people in permanent housing will lead to less usage of other service systems—most notably, hospitals and jails, thus saving money. Similar cost-savings claims have been central to the rhetoric over ending homelessness. ⁷⁶

But in the academic literature, the cost-savings argument for Housing First is treated with more skepticism. Here is an area where RCT-level rigor truly matters. Studies that have a "pre-post" design look at the reduction in costs of hospitals, jails, and so on, that result when a cohort is moved from the streets to stable housing. Homeless people who are put into permanent supportive housing programs often have extraordinarily high health costs immediately before their placement. But someone who costs the healthcare system \$100,000 in a given year is not necessarily going to cost the health-care system \$100,000 every year of his adult life.⁷⁷ The reduction in costs, following a high utilizer's housing placement, may have as much to do simply with a "regression to the mean" than the virtue of the Housing First /PSH intervention.⁷⁸

Moreover, high utilizers such as Million-Dollar Murray and people with untreated schizophrenia who have lived for years on the street are unrepresentative of the homeless population as a whole. Not only a minority, they are a minority of the chronic homeless. They are certainly unrepresentative of the "working poor" or "down on their luck" homeless often cited in the media. The 2015 Family Options Study, prepared for HUD, examined various housing interventions among a pool of more than 2,000 homeless families with moderate social needs, over a three-year period. The permanent housing intervention was more successful in achieving housing stability than temporary housing interventions, but it was also more expensive. The

Governments can't save costs from people who don't make much use of expensive service systems, to begin with. Some homeless may have low service costs because they're "service-resistant," a particularly significant problem for the mentally ill. Another reason that many of the homeless may be low utilizers is that they live in a jurisdiction with limited mentalhealth and substance-abuse services⁸¹ (states vary dramatically in their investment in behavioral health).⁸² "Usual care," the control with which some studies compare Housing First interventions, can vary widely between jurisdictions. "Usual care," in the case of New York City, means a \$2 billion shelter system. But, in other communities, to build a Housing First–oriented homeless services system might mean building the first homeless services system that they ever had.⁸³

This is not to say that homeless services systems shouldn't focus on "high utilizers," or that, in some cases, they may yield short-term savings on jails and hospitals for certain individuals. But Housing First's success with different homeless populations has been cited as evidence of its merit as a systemwide organizing principle, applicable for the entire homeless population. The evidence is weak that a systemwide application of Housing First—for the benefit of the many different types of homeless people—would generate net savings for taxpayers.

Physical Health-Care Systems. Homeless people are generally in bad health, due to rare diseases and illnesses associated with living in conditions not meant for human habitation, high rates of substance abuse, and inadequate treatment for ordinary illnesses. They also make heavy use of emergency rooms and other expensive crisis services. Once they are stably housed, the homeless will be better positioned to avoid the need for costly triage treatment and instead use ordinary outpatient forms of care to prevent their health problems from becoming crises. Housing First programs will thus supposedly achieve better health at lower costs.

Evidence of the health effects of Housing First and permanent supportive housing is far less robust than many suggest. It is fair to argue that no policymaker who wants better health for the homeless can be indifferent as to whether they stay on the streets. But even assuming that Housing First improves people's physical health, it is not clear that that would mean it saved money. People who live long healthy lives have high health-care costs. 86 Cost-efficiency arguments for smoking-cessation campaigns have been criticized for failing to take into account the fact that nonsmokers live longer than smokers.87 Perhaps the most reasonable view was expressed in a 2018 survey of the literature by the National Academies of Sciences, Engineering, and Medicine. While still defending the view that "housing in general improves health," this study came to the overall conclusion that "there is no substantial published evidence as yet to demonstrate that PSH improves health outcomes or reduces health care costs."88

Mental-Health-Care Systems. Arguments that the mental-health-care system, which has always been expensive, holds great potential for cost savings, go back a very long time. Deinstitutionalization promised better care and at a lower cost. On an annual basis, inpatient psychiatric commitment at a state-run facility can run close to \$250,000. But civil commitment doesn't apply to the entire seriously mentally ill homeless population, which is itself a minority of the total homeless population (116,179 out of 567,715). (Million-Dollar Murray was an alcoholic, not a schizophrenic.) Psychiatric hospitals have fixed costs that are difficult to reduce even if a few people avoided being committed as a result of receiving housing benefits.

Criminal-Justice Systems. Jails also have significant fixed costs. Over the last decade, New York City's jail population has declined by 40% while the Department of Correction budget has increased by one-third. ⁹² The argument that Housing First saves money on jails dovetails with the critique of the so-called criminalization of homelessness. ⁹³

There is no question that enforcing quality-of-life ordinances, which are often violated by the homeless, 94 places a fiscal burden on public safety agencies. However, it does not follow that investing massively in permanent supportive housing and drastically scaling back on law enforcement would be fiscally prudent.

First, as discussed above, academic studies and the experience of jurisdictions in California have demonstrated the weakness of permanent supportive housing programs to reduce homelessness and thus presumably reduce public complaints about disorder. Second, less law enforcement carries costs, including public spaces increasingly occupied by encampments (and their attendant crime and public-health burdens) and attracting more street homeless from neighboring jurisdictions, thus increasing the demand for public services.

In any event, total law-enforcement cost savings would be very difficult to calculate, since jail is a small part of the "use" that homeless make of the criminal-justice system (very few misdemeanor offenses result in incarceration).⁹⁵ If 20 men are removed from Los Angeles's Skid Row by being put in permanent supportive housing, how many cops would the LAPD redeploy? Quite possibly, there would be no savings.

Shelter Systems. San Francisco's "Navigation Center" costs \$100 per bed per night. In New York City, shelter beds for families with children average \$201.60 (an 89% increase since FY15) and for single adult shelter beds, the average is \$124.38 (a 58% in-

crease since FY15). 97 Shelter costs are high to ensure a certain level of quality, particularly security and on-site social services. For decades, and long before Housing First and its attendant social science literature, advocates claimed that affordable housing is cheaper than shelter. 98 A leading topic of housing policy debate in New York state government concerns "Home Stability Support." This program would increase the "shelter allowance," a permanent housing benefit to which public assistance clients are entitled. Proponents of Home Stability Support estimate that a more generous shelter allowance would cost New York City taxpayers about \$27,000 less than shelter on an annual basis. 99

But comparing temporary and permanent housing costs raises "apples to oranges" difficulties. It is complicated to compare a housing benefit that someone may well receive for decades with one that he would receive for only weeks or months. People who receive subsidized housing in tight rental markets are apt to continue using that benefit for a long time. 100 In New York City, the average length of stay for a public housing resident is 23 years. 101 In 2017, the most recent year for which there are data, only about 16% of permanent supportive housing residents moved out, and the share of long-stayers in permanent supportive housing has been steadily increasing over the years.¹⁰² It is extremely expensive to provide a lifetime rental subsidy to someone, which is how permanent housing benefits function in the high-cost jurisdictions that now face the most serious homelessness challenges. It would be extraordinarily expensive to provide such subsidies to everyone, every year, who claims to be homeless in such jurisdictions. It would be much cheaper to provide temporary assistance to the vast majority of the homeless.

Governments that invest heavily in Housing First programs should expect the overall cost of government to rise. For some individuals, or some service systems, there may be cost offsets, but cost offsets are different from savings. A \$1 investment in Housing First may be offset by 30 cents in savings on other service systems, but that still means that the government is 70 cents larger. Certainly, cost-effectiveness arguments should not lead anyone to think that Housing First investments will lead to tax reductions or somehow free up money that may be devoted to other purposes. Service systems' costs are split between various governments and agencies and even nonprofit organizations. (This has been referred to as the "wrong pockets" problem.)¹⁰³

Dennis Culhane, a leading homelessness researcher who was featured in "Million-Dollar Murray," has subsequently cautioned against the risk of "overstating" the cost-savings argument. In 2008, he criticized

the design quality of more than 40 cost studies based upon their small size and selectivity in populations examined, noting that "in general, the larger the sample (and presumably the more representative of adults who are homeless), the lower the average annual costs of services use." But such studies are beneficial, he says, for showing the efficiency and accountability of homeless services systems and thus "mobiliz[ing] political will."¹⁰⁴

It is certainly the case that, in many jurisdictions where homelessness is at crisis levels, the public has shown a marked willingness to raise taxes for homeless services. Some recent, successful ballot initiative campaigns in California, such as Measure HHH (Los Angeles County, 2016), made use of cost-savings rhetoric. Whether those arguments were, ultimately, more important for the voting public than humanitarian considerations is unclear. Some scholars have questioned the benefit of distracting from the humanitarian case for investing in homeless services. ¹⁰⁵ Certainly, for those with poor physical or mental health, it is not obvious why reducing health-care expenditures should be a standard of policy effectiveness.

In sum, the truly "evidence-based" view of Housing First, when it comes to cost savings, bears a certain parallel with residential stability. The evidence supports the view that a Housing First intervention may, for certain individuals, reduce costs, at least in the short term. But the evidence does not support any thesis about systemwide cost savings. Housing First has not been demonstrated to be capable of saving costs for entire systems any more than it has been demonstrated to be capable of ending homelessness for entire communities.

IV. The Record on Behavioral Health

HUD estimates that 16% of the homeless population exhibits "Chronic Substance Abuse" and that "Severe Mental Illness" afflicts 20%. ¹⁰⁶ Drug addiction and mental illness drive much of the "chronic homelessness" challenge. Permanent housing is seen as a condition of recovery for this cohort. ¹⁰⁷ One of the main recommendations that USICH made in its 2017 brief, "Strategies to Address the Intersection of the Opioid Crisis and Homelessness," was to "Remove Barriers to Housing" by implementing Housing First. ¹⁰⁸ But the research is ambiguous as to how much permanent housing, on its own, stimulates recovery.

In a 2019 law review article, Sara Rankin, of Seattle University School of Law, argued in favor of Housing First based on "the reality that people need basic necessities like food, sleep, and a stable place to live before attending to any secondary issues, such as getting a job, budgeting properly, or attending to substance use issues." She wrote that the "Housing First approach views housing as the foundation for life improvement and enables access to permanent housing without prerequisites or conditions beyond those of a typical renter."¹⁰⁹

However, a 2017 survey of the literature by researchers Stefan G. Kertesz and Guy Johnson judged Housing First to have demonstrated, at best, modestly beneficial clinical impacts. The Trump administration's CEA acknowledged the research on Housing First residential stability but argued: For outcomes such as impacts on substance abuse and mental illness, Housing First in general performs no better than other approaches. The 2018 study published by the National Academies of Sciences, Engineering, and Medicine found no strong evidence of Housing First and improvement of mental disorders, as have other surveys.

Stated otherwise, the evidence for Housing First and behavioral health is far weaker than for residential stability. Some Housing First proponents, committed to the harm-reduction philosophy of recovery as a choice, are forthright about Housing First's modest ability to address behavioral health disorders. Harm-reduction policy calls for prioritizing the remediation of symptoms and the harmful effects of disorders such as opioid addiction over trying to root out or overcome the underlying disorder. More commonly, though, advocates display a rhetorical suggestiveness about the link between permanent housing and behavioral health that seems intended to convince the public of evidence that does not exist. 114

V. Self-Sufficiency and Social Isolation

Originally, Housing First was mainly associated with the chronic homeless population who had disabilities—most notably, serious mental illness. Hence, employment outcomes were not of leading interest. But as the theory of Housing First has evolved to take on a "systemwide orientation," applicable to the entire homeless population, it has come to be applied for cohorts that might be considered potential members of the working class. Permanent housing benefits are often likened to a "platform" from which, after having secured stable

housing, people can go to pursue various other goals, such as health and employment. ¹¹⁵ "Optimize self-sufficiency" is an official goal of HUD's NOFA. ¹¹⁶

As noted, the large-scale Family Options Study (2015) showed robust rates of residential stability for the families receiving a permanent housing intervention. Accordingly, the study has been seen as supportive of Housing First, particularly as regards the "whole systems" orientation. But it also found evidence that housing subsidies, instead of granting recipients the freedom to focus more on employment and less on their housing instability challenges (à la the "platform" theory), actually led to diminished work effort. 117 In sum, housing subsidies increased rates of housing stability (and, as noted, at a greater cost than other interventions) but not self-sufficiency. 118 This was a troubling finding, since lack of work was one of the major social challenges faced by homeless families that participated in the study. 119 A 2012 article about Housing First cautioned that "subsidized housing may create disincentives for employment ... and for independent housing ... much in the way that disability benefits and public income support have been found to be associated with less employment."120

Another outcome worth evaluating is social isolation, a significant cause of homelessness. HUD has noted that while, nationwide, about 13% of the U.S. population is a member of a single-person household, 65% of the sheltered homeless population is. 121 "Community integration" was one of the original goals of Housing First, which criticized the quasi-institutional character of the linear homeless services system. 122

ProPublica's "Right to Fail" report in late 2018, and the accompanying documentary released by Frontline in February 2019, 123 suggested that Housing First may serve more to increase social isolation than address it.124 The report profiled a few seriously mentally ill clients of a supported housing program in New York, and how an excess of independence led to decompensation and even death. These individuals were, in some cases, stably housed, but living in apartments strewn with waste, swarming with bugs, and living with untreated infections and other health problems, and extremely isolated. "Right to Fail" did not specifically target Housing First—these were former residents of adult homes who had been placed in independent living under court order. Still, the report demonstrates that many mentally ill adults are, on the one hand, not eligible for institutionalization but, on the other, plainly not prepared for independent living.

The ProPublica study cannot be dismissed as simply anecdotal.¹²⁵ Several peer-reviewed articles and studies

have questioned whether Housing First has lived up to its initial promise of "community integration." Others, to be sure, have defended it. 127 But the least that can be said is that whatever some Housing First program may have managed to achieve with respect to community integration, the evidence is far weaker with respect to that outcome than has been measured with respect to residential stability.

VI. Conclusion

The claim that Housing First is "proven" is an attempt to take homelessness policy out of the realm of ordinary policy debate. "Evidence-based" rhetoric means to suggest that homelessness policy is simply different: alternatives to Housing First are illegitimate because they are not grounded in science in the way that Housing First is. This is not accurate. Homelessness policy questions should not be considered more settled than questions of mental health, public safety, or any other element of poverty or social policy.

It is crucial to parse claims about what is evidence-based about Housing First and what is founded on humanitarian concerns, intuition, ideology, or some other factor. There is no evidence-based proof of Housing First's ability to treat serious mental illness effectively, or drug or alcohol addiction. Housing First is not a reliable solution to social isolation, a very significant cause and effect of homelessness. Claims made on behalf of the campaign to end homelessness—that Housing First has ended veterans' homelessness, chronic homelessness, or homelessness at the community level—are not based in "evidence," as that term is normally understood, and they rely on a highly technical (and dubious) definition of "ending" homelessness.

A common refrain among advocates is that "'Housing First' does not mean 'Housing Only.' "128 This is not an evidence-based claim. The claim could be verified only through a broad and thorough analysis of Housing First's implementation across scores of programs across the nation. Surely, some programs are far more inventive in getting service-resistant clients to accept treatment and services than are others. A supportive housing program that systematically fails to engage any of its clients is, practically speaking, a "Housing Only" program. The literature about how Housing First programs function is far too sparse to validate that "'Housing First' does not mean 'Housing Only.'"

There is, however, reasonable evidence to suggest that Housing First-style interventions will promote residential stability, and quite likely at a higher rate than programs that provide housing on a time-limited basis and/or rely on "barriers," at least over a one-to two-year horizon. But an intervention is different from a policy or service system. An intervention could be one program among many. The evidence does not support the idea that Housing First should be made an organizing principle of homeless services systems. Arguments for Housing First on a systemwide basis may be defended based on intuition or humanitarian concerns, but they are not evidence-based.

The result of governments adopting Housing First as a "whole-system orientation" has been to discredit, or at least drastically de-emphasize, approaches to homelessness other than permanent housing. Less than one-fifth of the homeless population is "chronic" 129—the population for whom Housing First was initially developed. The more that the homeless problem is described as people "down on their luck," the less logical is the claim that permanent housing is the solution. Housing First is an entirely inappropriate intervention for the working poor, examples of which include participants in "Safe Parking" programs¹³⁰ (which is to say that, in addition to reckoning with the limitations of Housing First for the chronically homeless, permanent housing is not always an appropriate solution to street homelessness).

What kind of homeless services system do we want? That is ultimately what the Housing First debate is about. As noted, the reduction in transitional housing units is a striking example of the influence of Housing First. But it is impractical to try to design a homeless services system without programs that have features similar to transitional housing. The homeless population has many problems other than housing instability. As such, there is a certain logic to trying to address these problems along with housing instability and give them equal emphasis while doing so. That logic, though, runs contrary to the logic of Housing First, which, particularly in its original articulation, insisted on the separation of housing and social services.

In the criminal-justice world, "problem-solving courts" such as drug and mental-health courts are not simply concerned with adjudicating charges. They also deal with the addiction and untreated serious mental illness of people involved in the criminal-justice system. ¹³¹ Similarly, the linear approach to homelessness had much more of a problem-solving orientation than the current Housing First system—focused, as it is, on keeping the most people housed for the longest period of time.

But if homeless services systems don't work on problems other than housing instability, other systems will. Indeed, the line between emergency shelter and transitional housing can get blurry. New York City's family shelter system, for instance, in many ways resembles transitional housing more than traditional notions of emergency shelter.

Before Housing First, the homeless population was offered a robust variety of housing and service options that reflected their diverse needs. This so-called linear system viewed permanent supportive housing and other low-barrier housing programs for the homeless as valuable to a continuum of service options. ¹³² But when too much emphasis is placed on low-barrier options, governments must ask whether they are designing a truly inclusive homeless services system.

Clearly, some clients will be best served by providers that emphasize sobriety and work. In the world of addiction services, many providers use social pressure to encourage sobriety. Is it illegitimate or not "evidence-based" for residential treatment programs to offer temporary housing coupled with sobriety requirements?¹³³ What's more important achieving a year of sobriety or a year of housing stability? A program that sets no goals other than "residential stability," and that specifically does not require sobriety, will not be able to use social pressure to encourage sobriety. The same issue arises for programs that try to turn their clients into responsible fathers and economically independent members of their communities. As an example: Joe Biden's presidential campaign has called for reinvesting in transitional housing programs to facilitate prisoner reentry. 134

Housing First is the dominant policy framework for homeless services. Yet, after years of implementation, communities are not close to ending homelessness. If homeless services systems can't focus as much on substance abuse, unemployment, and other social ills as they do on residential stability, those challenges will simply be left to other social-services systems. In light of these facts, a certain reorientation is justified.

Recommendations

1. HUD should allow more flexibility from Housing First requirements for communities pursuing homelessness assistance grants through the "Continuum of Care" program.

There are about 400 CoC agencies across the nation. HUD directs billions in Homelessness Assistance Grants through these agencies to on-the-ground service providers. Federal homeless services funding was structured in this manner in deference to localism.¹³⁵

When the CoC program was set up in the 1990s, it was "designed to meet the multi-faceted needs of homeless persons in the nation's communities."136 In many communities, the local "CoC" is the lead policymaking organization on homelessness. As Housing First requirements have tightened, however, the CoC program has been criticized for departing from its original spirit and adopting a "one-size-fits-all" approach to homeless services. 137 Many criticisms of HUD's application of Housing First principles have come from religious organizations, which have, for more a century, played a significant role in addressing homelessness. 138 The federally directed restructuring of homeless services has had a significant impact at the community level. Examples of highly regarded service providers that have experienced cuts include Community Housing Innovations, the largest provider of homeless services on Long Island, 139 and the New York City-based Doe Fund. 140 Other providers have ceased pursuing HUD funding or been pressured—by the federal government, ultimately—to make programmatic changes contrary to their priorities.

2. State and local Housing First mandates should be reassessed.

Homelessness is highly concentrated in certain urban areas, as are major homeless services systems. California and New York are hosts to about one-third of the total permanent and temporary year-round beds for the homeless. ¹⁴¹ Thus, state and local policies may, in some cases, matter even more than federal funding requirements. State Housing First mandates, such as

California's SB 1380,¹⁴² should be reassessed in light of the need to develop homeless services systems reflective of the needs of the entire homeless population.

3. The homelessness debate should be reintegrated into the safety-net debate.

Housing First has separated the debates over homelessness and the safety net more broadly. In its approach to poverty, the Trump administration has tried to promote the expanded use of work requirements for safety-net programs. While there is a serious debate over the appropriateness and effectiveness of work requirements for noncash programs such as Medicaid and the Supplemental Nutrition Assistance Program, there is a broad acceptance of their legitimacy in the case of public assistance. In homeless policy circles, by contrast, there is broad opposition to the use of work requirements, as well as drug testing, program-participation requirements, and adherence to treatment regimens.

As a result of Housing First's influence, the question of upward mobility for the homeless is discussed far less often than it is for the poor. Policymakers speak with modesty about such grandiose goals as ending poverty. But with respect to ending homelessness, they are expected to accept not only the nobility of that goal but its practicality. As a result, Housing First has come to function as a harm-reduction approach not only for behavioral health but also for poverty. Someone placed in permanent supportive housing may have ended his homelessness, but he is only managing his poverty.

Endnotes

- ¹ On the history of shelter programs, see Kim Hopper, *Reckoning with Homelessness* (Ithaca, NY: Cornell University Press, 2003); Charles Hoch and Robert A. Slayton, *New Homeless and Old: Community and the Skid Row Hotel* (Philadelphia: Temple University Press, 1989); Kenneth L. Kusmer, *Down and Out, on the Road: The Homeless in American History* (New York: Oxford University Press, 2001).
- 2 Stefan G. Kertesz et al., "Housing First for Homeless Persons with Active Addiction: Are We Overreaching?" Milbank Quarterly 87, no. 2 (June 2009): 495–534
- ³ U.S. Department of Housing and Urban Development (HUD), United States Interagency Council on Homelessness (USICH), "Priority: Home! The Federal Plan to Break the Cycle of Homelessness," 1994, pp. 73–75; HUD, "Notice of Funding Availability for Continuum of Care Homeless Assistance: Funding Availability," *Federal Register* 61, no. 52 (Mar. 15, 1996): 10866–77.
- ⁴ New York City Commission on the Homeless, "The Way Home: A New Direction in Social Policy," February 1992, pp. 13, 32, 39–41, 55, 59; Rob Teir, "Restoring Order in Urban Public Spaces," *Texas Review of Law & Politics* 2, no. 2 (Spring 1998): 255–92; Alice S. Baum and Donald W. Burnes, *A Nation in Denial: The Truth About Homelessness* (Boulder, CO: Westview, 1993), chap. 8; Thomas J. Main, *Homelessness in New York City: Policymaking from Koch to de Blasio* (New York: New York University Press, 2017), chap. 3; HUD, "Priority: Home!" pp. 20–21, 37, 55–56, 94–96, 111–13.
- ⁵ HUD, "Priority: Home!" p. iii: "I do not believe we can repair the basic fabric of society until people who are willing to work have work. Work organizes life. It gives structure and discipline to life. It gives a role model to children. We cannot repair the American community and restore the American family until we provide the structure, the value, the discipline and reward that work gives."
- 6 Ibid., p. 34.
- ⁷ Shannon E. Couzens, "Priority: Home! A True Priority? An Analysis of the Federal Plan to Break the Cycle of Homelessness," Journal of Social Distress and the Homeless 6, no. 4 (1997): 275–82.
- President John F. Kennedy, "Special Message to the Congress on Mental Illness and Mental Retardation," Feb. 5, 1963: "When carried out, reliance on the cold mercy of custodial isolation will be supplanted by the open warmth of community concern and capability. Emphasis on prevention, treatment, and rehabilitation will be substituted for a desultory interest in confining patients in an institution to wither away."
- 9 Jack Tsai, Alvin S. Mares, and Robert A. Rosenheck, "A Multi-Site Comparison of Supported Housing for Chronically Homeless Adults: 'Housing First' Versus 'Residential Treatment First,' " Psychological Services 7, no. 4 (November 2010): 220.
- 10 HUD, "The 2017 Annual Homeless Assessment Report (AHAR) to Congress, Part 2: Estimates of Homelessness in the United States," October 2018, p. v.
- 11 See, e.g., Sam Tsemberis, "From Streets to Homes: An Innovative Approach to Supported Housing for Homeless Adults with Psychiatric Disabilities," *Journal of Community Psychology* 27, no. 2 (1991): 227: "Most [linear residential treatment] housing providers regard themselves as treatment providers rather than as landlords"; Priscilla Ridgway and Anthony M. Zipple, "The Paradigm Shift in Residential Services: From the Linear Continuum to Supported Housing Approaches," *Psychosocial Rehabilitation Journal* 13, no. 4 (April 1990): 17: "The residential program is seen as primarily a clinical modality designed to treat mentally ill individuals rather than a home for those who live there"; Daniel Gubits et al., "Family Options Study: Short-Term Impacts of Housing and Services Interventions for Homeless Families," HUD, Office of Policy Development and Research, July 2015, p. xxi: "Practitioners' goals for project-based transitional housing ... extend beyond housing stability to adult well-being and aspects of family self-sufficiency."
- ¹² Sue Barrow and Rita Zimmer, "Transitional Housing and Services: A Synthesis," in *Practical Lessons: The 1998 National Symposium on Homelessness Research*, ed. Linda B. Fosburg and Deborah L. Dennis, HUD and U.S. Department of Health and Human Services (HHS), 1999, p. 315.
- ¹³ Ibid., p. 313; H. Stephen Leff et al., "Does One Size Fit All? What We Can and Can't Learn from a Meta-Analysis of Housing Models for Persons with Mental Illness," *Psychiatric Services* 60, no. 4 (April 2009): 473–82.
- ¹⁴ Ridgway and Zipple, "The Paradigm Shift in Residential Services"; Kertesz, "Housing First for Homeless Persons with Active Addiction"; Victoria Stanhope and Kerry Dunn, "The Curious Case of Housing First: The Limits of Evidence-Based Policy," *International Journal of Law and Psychiatry* 34, no. 4 (July/August 2011): 275–82.
- ¹⁵ The role played by advocates in the popular adoption of the term "homeless" has been discussed in many sources. See, e.g., Robert C. Ellickson, "Controlling Chronic Misconduct in City Spaces: Of Panhandlers, Skid Rows, and Public-Space Zoning," *Yale Law Journal* 105, no. 5 (January 1996): 1192–93, 1214; Richard W. White, Jr., *Rude Awakenings: What the Homeless Crisis Tells Us* (San Francisco: ICS, 1992), chap. 9; Brendan O'Flaherty, *Making Room* (Cambridge, MA: Harvard University Press, 1996), pp. 9–11; Forrest Stuart, *Down, Out, and Under Arrest* (Chicago: University of Chicago Press, 2018), p. 49; Hopper, *Reckoning with Homelessness*, p. 7; HUD, "Priority: Home!" p. 22.
- 16 Sam Tsemberis and Sara Asmussen, "From Streets to Homes: The Pathways to Housing Consumer Preference Supported Housing Model," Alcoholism Treatment Quarterly 17, nos. 1–2 (1999): 113–14, 127.
- ¹⁷ Leff, "Does One Size Fit All?"; Deborah K. Padgett et al., "Substance Use Outcomes Among Homeless Clients with Serious Mental Illness: Comparing Housing First with Treatment First Programs," *Community Mental Health Journal* 47, no. 2 (April 2011): 227–32; DJ Jaffe, *Insane Consequences: How the Mental Health Industry Fails the Mentally Ill* (Buffalo, NY: Prometheus, 2017), pp. 100–102.
- ¹⁸ Ridgway and Zipple, "The Paradigm Shift in Residential Services," p. 20: "The tendency to cluster or congregate persons with a history of mental illness tends to replicate historical institutional responses that were designed to segregate and contain deviants"; Kim Hopper et al., "Homelessness, Severe Mental Illness, and the Institutional Circuit," *Psychiatric Services* 48, no. 5 (May 1997): 659–65.
- ¹⁹ Paul Carling, "Major Mental Illness, Housing, and Supports: The Promise of Community Integration," *American Psychologist* 45, no. 8 (August 1990): 969–75.
- Housing programs are more difficult to categorize than is typically acknowledged in the literature. Traditionally, "supported housing" meant ordinary rental apartments leased from a private landlord via a service provider. The term meant "tenant-based" or "scatter-sited" housing for the homeless, with services made available 24/7 but based out of a separate location. "Supportive housing," by contrast, was understood to mean congregate- or project-based—custom-built affordable housing for the homeless that offers 24/7 services on-site. However, the terms have become blurred, and "supportive housing," by far the more common term, now refers to both project-based and tenant-based programs. Support for "supportive housing" and "permanent supportive housing" programs has also become generally indistinguishable from support for Housing First, even though some older supportive housing programs were not designed in accord with Housing First principles. It is possible that the blurring of these concepts in advocates' rhetoric has been deliberate (see Richard Cho, "Four Clarifications About Housing First," USICH, June 18, 2014: "I see it as a sign of progress that permanent supportive housing and Housing First are being conflated").
- 21 Though Pathways to Housing continues to operate in other jurisdictions, its New York program was forced to close because of bankruptcy proceedings, as Tsemberis's efforts to expand the program nationally jeopardized contracts with the state Office of Mental Health and even risked eviction for more than 100 Pathways clients. See Greg B. Smith, "Homeless Group in \$25M Bankruptcy Fight Failed to Pay Rent for Mentally III," New York Daily News,

- Feb. 13, 2018; "Motion to Approve Settlement, Deborah J. Piazza, as Chapter 7 Trustee of Pathways to Housing NY, Inc., Plaintiff, v Sam Tsemberis and Pathways to Housing National, Inc. a/k/a Pathways to Housing, Inc.," United States Bankruptcy Court, Southern District of New York, Mar. 2, 2018.
- ²² National Alliance to End Homelessness, "A Plan, Not a Dream: How to End Homelessness in Ten Years," 2000.
- ²³ HUD, "Taking on the Problem That 'Cannot Be Solved,' "Secretary [Mel] Martinez's Speeches and Testimony, July 20, 2001.
- ²⁴ Douglas McGray, "The Abolitionist," *The Atlantic*, June 2004; Libby Perl et al., "Homelessness: Targeted Federal Programs," Congressional Research Service (CRS), Oct. 18, 2018; USICH, "U.S. Interagency Council on Homelessness Historical Overview," December 2016.
- ²⁵ Kertesz, "Housing First for Homeless Persons with Active Addiction," p. 497.
- ²⁶ California Senate Bill No. 1380, chap. 847, Sept. 29, 2016.
- ²⁷ HUD, "2017 Annual Homeless Assessment Report (AHAR)," pp. xii–xiii; USICH, "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness," 2010, and "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness as Amended in 2015," June 2015.
- ²⁸ USICH, "Home, Together: The Federal Strategic Plan to Prevent and End Homelessness," July 2018, p. 6.
- ²⁹ For the text of the letter, see Mitch Perry, "Ted Yoho Urges Ben Carson to Reverse Obama-Era 'Housing First,' Reinstate Homeless Shelter Funds," floridapolitics.com, June 19, 2017.
- ³⁰ See discussion in Libby Perl, "The HUD Homeless Assistance Grants: Programs Authorized by the HEARTH Act," CRS, Aug. 30, 2017.
- 31 "Letter to the Honorable Darrell Issa," HUD, Aug. 9, 2017 (letter not posted online; available on request from the author).
- ³² Jillian Kay Melchior, "Meet the Woman Rashida Tlaib Called a 'Prop,' " Wall Street Journal, Mar. 29, 2019; and see the series of HUD press releases: "HUD Makes \$2 Billion Available to Local Homeless Programs: Funding Notice Encourages Local Applicants to Use Housing First Approach," July 14, 2017; "HUD Awards Record \$2 Billion to Thousands of Local Homeless Assistance Programs Across U.S.," Jan. 11, 2018; "HUD Awards over \$202 Million to Help End Homelessness," Feb. 8, 2019; "HUD Renews Funding to Thousands of Local Homeless Programs," Jan. 26, 2019.
- 33 USICH, "CoC NOFA FY 2019: What's New and How to Build upon Your Work to End Homelessness," July 16, 2019, p. 13.
- ³⁴ National Alliance to End Homelessness et al., "Letter to Reps. Collins, Price, Reed, and Diaz-Balart," Dec. 3, 2019; Kriston Capps, "Trump's Plan to Criminalize Homelessness Is Taking Shape," CityLab, Dec. 17, 2019.
- 35 116th Congress of the United States, "Further Consolidated Appropriations Act, 2020" (HR 1865), p. 458: "when awarding funds under the Continuum of Care program, the Secretary shall not deviate from the FY 2018 Notice of Funding Availability with respect to the tier 2 funding process, the Continuum of Care application scoring, and for new projects, the project quality threshold requirements, except as otherwise provided under this Act or as necessary to award all available funds or consider the most recent data from each Continuum of Care."
- ³⁶ Council of Economic Advisers (CEA), "The State of Homelessness in America," September 2019, pp. 23–26.
- ³⁷ Arthur Delaney, "How a Traveling Consultant Helps America Hide the Homeless," HuffPost, Mar. 9, 2015. See also Western Regional Advocacy Project, "Criminalization Hitting the Fan at National Level Under Trump: Appointment of Robert Marbut to USIACH [sic]," Dec. 4, 2019; Kriston Capps, "The Consultant Leading the White House Push Against Homelessness," CityLab, Dec. 12, 2019; Capps, "Trump's Plan to Criminalize Homelessness"; Ben Kesling, "New Homelessness Czar Takes Aim at Long-Standing Policy," Wall Street Journal, Feb. 1, 2020.
- ³⁸ Heather Knight, "A Decade of Homelessness: Thousands in S.F. Remain in Crisis," *San Francisco Chronicle*, June 30, 2014; San Francisco Ten-Year Planning Council, "The San Francisco Plan to Abolish Homelessness," 2014; Robert Greene, "Tell Us Why This Homelessness Plan Will Work When the Others Failed," *Los Angeles Times*, Jan. 27, 2016; Bring L.A. Home Blue Ribbon Panel, "Bring Los Angeles Home: The Campaign to End Homelessness," 2006.
- ³⁹ Mark Baldassare et al., "Californians & Their Government," Public Policy Institute of California, January 2020; San Francisco Controller, "2019 San Francisco City Survey: A Biennial Survey of San Francisco Residents," May 13, 2019, pp. 7, 10; San Francisco Chamber of Commerce, "Public Safety, Homelessness and Affordability Are Biggest Issues in 2018 SF Chamber Poll, Feb. 2, 2018; Benjamin Oreskes, Doug Smith, and David Lauter, "95% of Voters Say Homelessness Is L.A.'s Biggest Problem, Times Poll Finds. 'You Can't Escape It,' " Los Angeles Times, Nov. 14, 2019; Emily Alpert Reyes, Benjamin Oreskes, and Doug Smith, "L.A. Is Swamped with 311 Complaints over Homeless Camps. But Are the Cleanups Pointless?" Los Angeles Times, June 7, 2019.
- 40 National Academies of Sciences, Engineering, and Medicine, Permanent Supportive Housing: Evaluating the Evidence for Improving Health Outcomes Among People Experiencing Chronic Homelessness (Washington, DC: National Academies Press, 2018), pp. 31–32.
- ⁴¹ Richard Cho, "Four Clarifications About Housing First," usich.gov, June 18, 2014: "Housing First is not a 'program.' It is a whole-system orientation and response." See also USICH, "Home, Together" and "Deploy Housing First Systemwide," Aug. 15, 2018; Deborah Padgett, Benjamin Henwood, and Sam Tsemberis, Housing First: Ending Homelessness, Transforming Systems, and Changing Lives (New York: Oxford University Press, 2015); USICH, "The Evidence Behind Approaches That Drive an End to Homelessness," September 2019, p. 4.
- ⁴² USICH, "Housing First Checklist: Assessing Projects and Systems for a Housing First Orientation," September 2016, and "Tools That Support the Implementation of Home, Together," December 2019.
- ⁴³ USICH, "Tools That Support the Implementation of Home," p. 7.
- ⁴⁴ Patrick J. Fowler, "U.S. Commentary: Implications from the Family Options Study for Homeless and Child Welfare Services," *Cityscape: A Journal of Policy Development and Research* 19, no. 3 (Winter 2017): 255–64; HUD, "SNAPS in Focus: The Family Options Study," July 8, 2015.
- ⁴⁵ See New York City Council, "Our Homelessness Crisis: The Case for Change," January 2020, pp. 129–30; USICH, "The Evidence Behind Approaches," p. 4
- ⁴⁶ McGray, "The Abolitionist"; Scott Carrier, "The Shockingly Simple, Surprisingly Cost-Effective Way to End Homelessness," *Mother Jones*, Feb. 17, 2015; USICH, "The Evidence Behind Approaches"; Coalition for the Homeless, "Proven Solutions."
- ⁴⁷ Ben Carson, "We Know How to End Homelessness and Housing Shortages," *USA Today*, Dec. 15, 2017: "For years, there has been a growing mountain of data showing that a Housing First approach works to reduce not only costs to taxpayers but the human toll as well. The evidence is clear: Doing something is better and less expensive than doing nothing. That something is prioritizing housing. Once we give people a stable place to live, it becomes much easier to provide mental and physical health treatment, education and job training—essential rungs on the ladder out of homelessness. As we prepare to turn the calendar on another year, we can say without hesitation that we know how to end homelessness."
- ⁴⁸ Sam Tsemberis, Douglas Kent, and Christy Respress, "Housing Stability and Recovery Among Chronically Homeless Persons with Co-Occurring Disorders in Washington, D.C.," *American Journal of Public Health* 102, no. 1 (January 2012): 13–16, is an example of a study that looks at the number of people still housed at the end of the study; Robert Rosenheck et al., "Cost-Effectiveness of Supported Housing for Homeless Persons with Mental Illness," *Archives of General Psychiatry* 60, no. 9 (September 2003): 940–51, is an example of a study that uses the "days housed" measure; see also National Academies, *Permanent Supportive Housing*, pp. 40, 41, 49, 68, 84–85.

- ⁴⁹ Angela Ly and Eric Latimer, "Housing First Impact on Costs and Associated Costs Offsets: A Review of the Literature," *Canadian Journal of Psychiatry* 60, no. 11 (November 2015): 475–87.
- ⁵⁰ Debra J. Rog et al., "Permanent Supportive Housing: Assessing the Evidence," Psychiatric Services 65, no. 3 (March 2014): 287–94.
- ⁵¹ Stefan G. Kertesz and Guy Johnson, "Housing First: Lessons from the United States and Challenges for Australia," *Australian Economic Review* 50, no. 2 (May 2017): 220–28.
- ⁵² National Academies, *Permanent Supportive Housing*, pp. 3, 17, and chap. 8 on "Research Gaps"; Rog, "Permanent Supportive Housing," pp. 289, 293; Elizabeth A. Benston, "Housing Programs for Homeless Individuals with Mental Illness: Effects on Housing and Mental Health Outcomes," *Psychiatric Services* 66, no. 8 (August 2015): 811–13; Stefan Kertesz et al., "Housing First on a Large Scale: Fidelity Strengths and Challenges in the VA's HUD–VASH Program," *Psychological Services* 14, no. 2 (May 2017): 118–28; Kertesz and Johnson, "Housing First: Lessons from the United States," p. 223; Ana Stefancic et al., "The Pathways Housing First Fidelity Scale for Individuals with Psychiatric Disabilities," *American Journal of Psychiatric Rehabilitation* 16, no. 4 (October 2013): 242: "unwelcome model drift."
- ⁵³ Surveys of this literature may be found in Padgett, Henwood, and Tsemberis, *Housing First*; Brendan O'Flaherty, "Homelessness Research: A Guide for Economists (and Friends)," *Journal of Housing Economics* 44, issue C (2019): 1–25; Kertesz and Johnson, "Housing First: Lessons from the United States."
- ⁵⁴ CEA, "State of Homelessness," pp. 24-25.
- ⁵⁵ Ibid., p. 11.
- ⁵⁶ Steven Raphael, "Housing Market Regulation and Homelessness," in *How to House the Homeless*, ed. Ingrid Gould Ellen and Brendan O'Flaherty (New York: Russell Sage, 2010).
- ⁵⁷ BallotPedia, "Los Angeles, California, Homelessness Reduction and Prevention Housing, and Facilities Bond Issue, Measure HHH (November 2016)."
- ⁵⁸ Thomas Byrne et al., "The Relationship Between Community Investment in Permanent Supportive Housing and Chronic Homelessness," Social Service Review 88, no. 2 (June 2014): 234–63; Kevin Corinth, "The Impact of Permanent Supportive Housing on Homeless Populations," Journal of Housing Economics 35 (March 2017): 69–84; Kevin Corinth, "Ending Homelessness: More Housing or Fewer Shelters?" American Enterprise Institute, November 2015; O'Flaherty, "Homelessness Research," pp. 12–14.
- ⁵⁹ Michael Hobbes, "Why America Can't Solve Homelessness," Huffpost.com, May 15, 2019.
- ⁶⁰ Kevin C. Corinth, "On Utah's 91% Decrease in Chronic Homelessness," American Enterprise Institute, March 2016; idem, "Think Utah Solved Homelessness? Think Again," HuffPost, March 4, 2016.
- ⁶¹ Matthew Doherty, "What I Learned About Housing First from Lloyd Pendleton," endhomelessness.org, May 6, 2019; Laurel Wamsley, "White House Names Controversial Pick to Head Homelessness Office," npr.org, Dec. 5, 2019.
- 62 USICH, "Communities That Have Ended Homelessness."
- 63 Tom Albanese, "Veterans," Center for Evidence-Based Solutions to Homelessness, December 2017; New York City Council, "Our Homelessness Crisis: The Case for Change," January 2020, p. 49; HUD, "2017 Annual Homeless Assessment Report (AHAR)," p. iii; Harvard Kennedy School, Joint Center for Housing Studies of Harvard University, "The State of the Nation's Housing 2018," p. 34; Shaun Donovan and Eric K. Shinseki, "Homelessness Is a Public Health Issue," American Journal of Public Health 103, no. S2 (December 2013): S180; USICH, "Home, Together," p. 4.
- ⁶⁴ O'Flaherty, "Homelessness Research," p. 21.
- 65 USICH, "What Does Ending Homelessness Mean?" June 4, 2018.
- ⁶⁶ Kertesz, "Housing First for Homeless Persons with Active Addiction," p. 503.
- ⁶⁷ USICH, "Communities That Have Ended Homelessness."
- ⁶⁸ Barbara Duffield, "Are We Creating Chronic Homelessness? The Past, Present, and Future of Federal Homelessness Policy," Institute for Children, Poverty & Homelessness, October 2016.
- 69 USICH, "What Does Ending Homelessness Mean?"
- V.S. Committee on Financial Services, "Chairwoman Waters Introduces Bill to End Homelessness in America," Mar. 26, 2019; Office of the Mayor of Los Angeles, "Mayor Garcetti Leads Coalition of Mayors Calling for Federal Action to Confront Homelessness Crisis," July 1, 2019; New York City, Office of the Mayor, "Transcript: Mayor de Blasio Presents 2020 State of the City," Feb. 6, 2020: "We have to end homelessness as we know it in New York City"; Protecting and Empowering Renters," elizabethwarren.com; "Housing for All," berniesanders.com; "Coming Home: An Agenda for Housing Justice in America," peteforamerica.com.
- 71 O'Flaherty, Making Room.
- 72 Discussed in Main, Homelessness in New York City, chap. 3.
- 73 Kertesz, "Housing First for Homeless Persons with Active Addiction"; CEA, "State of Homelessness in America"; O'Flaherty, "Homelessness Research."
- ⁷⁴ Malcolm Gladwell, "Million-Dollar Murray," *The New Yorker*, Feb. 5, 2006.
- ⁷⁵ Dennis P. Culhane, "The Costs of Homelessness: A Perspective from the United States," *European Journal of Homelessness* 2, no. 1 (December 2008): 105.
- ⁷⁶ Ibid.: "Among advocates for the homeless in the US, a truism has long held that homelessness is more expensive to society than the costs of solving the problem." Philip Mangano, quoted in Erik Eckholm, "New Campaign Shows Progress for Homeless," *New York Times*, June 7, 2006: "Cost-benefit analysis may be the new compassion in our communities."
- ⁷⁷ Tracy L. Johnson et al., "For Many Patients Who Use Large Amounts of Health Care Services, the Need Is Intense Yet Temporary," *Health Affairs*, 34, no. 8 (August 2015): 1312–19; National Academies, *Permanent Supportive Housing*, pp. 4, 17, notes very large differences between what RCTs have found vs. what pre-post studies have found in terms of both cost savings and health.
- ⁷⁸ Ly, "Housing First Impact on Costs," p. 482; Stefan G. Kertesz et al., "Permanent Supportive Housing for Homeless People—Reframing the Debate," New England Journal of Medicine (Dec. 1, 2016): 2116.
- ⁷⁹ Kertesz and Johnson, "Housing First: Lessons from the United States," 224: "Housing First can almost 'pay for itself,' but only when it targets a costly clientele who represent only a very small portion of the chronically homeless."
- 80 Daniel Gubits et al., "Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families," HUD, Office of Policy Development and Research, October 2016, exhibit 9-5, p. 114.
- 81 Culhane, "Costs of Homelessness," pp. 103-4.

- 82 HHS, Substance Abuse and Mental Health Services Administration, "National Mental Health Services Survey (N-MHSS): 2017 Data on Mental Health Treatment Facilities," August 2018; DJ Jaffe and E. Fuller Torrey, "Funds for Treating Individuals with Mental Illness: Is Your State Generous or Stingy?" mentalillnesspolicy.org, Dec. 12, 2017.
- 83 Culhane, "Costs of Homelessness," 103: "Areas with more limited public services overall may well have fewer costly service users among the people who are homeless, meaning that there are few costs to offset as a result of an intervention."
- 84 See "Letter to the Honorable Darrell Issa," HUD, Aug. 9, 2017, pp. 3-4.
- ⁸⁵ Travis P. Baggett et al., "Mortality Among Homeless Adults in Boston: Shifts in Causes of Death over a 15–Year Period," *JAMA Internal Medicine* 173, no. 3 (February 2013): 189–95.
- ⁸⁶ Wei Sun, Anthony Webb, and Natalia Zhivan, "Does Staying Healthy Reduce Your Lifetime Health-Care Costs?" Center for Retirement Research at Boston College, May 2010.
- ⁸⁷ Jan J. Barendregt, Luc Bonneux, and Paul J. van der Maas, "The Health-Care Costs of Smoking," *New England Journal of Medicine* (Oct. 9, 1997): 2052–57; Wayne Hall and Chris Doran, "How Much Can the USA Reduce Health-Care Costs by Reducing Smoking?" *PLOS Medicine* 13, no. 5 (May 2016): 1–3.
- ⁸⁸ National Academies, *Permanent Supportive Housing*; Kertesz and Johnson, "Housing First: Lessons from the United States," 223: "Randomised trials have typically found no or minimal benefit for standard health measures."
- 89 Samuel R. Bagenstos, "The Past and Future of Deinstitutionalization Litigation," Law & Economics Working Papers, article 46, 2012; Howard H. Goldman, "Perspective: Justifying Mental Health Care Costs," *Health Affairs* 18, no. 2 (March/April 1999): 94–95; Roland Sturm, "The Myth of Medical Cost Offset," *Psychiatric Services* 52, no. 6 (June 2001): 738–40; Burton A. Weisbrod, "Benefit-Cost Analysis of a Controlled Experiment: Treating the Mentally Ill," *Journal of Human Resources* 16, no. 4 (Autumn 1981): 523–48.
- 90 National Association of State Mental Health Program Directors, "Trend in Psychiatric Inpatient Capacity, United States and Each State, 1970 to 2014," August 2017, p. 11.
- 91 HUD, "HUD 2019 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations," Sept. 20, 2019.
- 92 New York City Comptroller, "NYC Department of Correction FYs 2009–19 Operating Expenditures, Jail Population, Cost per Incarcerated Person, Staffing Ratios, Performance Measure Outcomes, and Overtime," Dec. 6, 2019.
- 93 Sara K. Rankin, "Punishing Homelessness," New Criminal Law Review: An International and Interdisciplinary Journal 22 no. 1 (Winter 2019): 99–135; Joseph W. Mead and Sara Rankin, "Criminalizing Homelessness Doesn't Work," CityLab, June 20, 2018.
- ⁹⁴ Gale Holland and Christine Zhang, "Huge Increase in Arrests of Homeless in L.A. but Mostly for Minor Offenses," Los Angeles Times, Feb. 4, 2018.
- ⁹⁵ Issa Kohler-Hausmann, *Misdemeanorland* (Princeton, NJ: Princeton University Press, 2018); Stuart, *Down, Out, and Under Arrest*; Rankin, "Punishing Homelessness."
- ⁹⁶ Kevin Fagan, "Bay Area Homelessness: 89 Answers to Your Questions," San Francisco Chronicle, July 28, 2019.
- ⁹⁷ City of New York, Mayor's Office of Operations, "Mayor's Management Report," September 2019, p. 197.
- 98 Robert Hayes, "Litigating on Behalf of Shelter for the Poor," Harvard Civil Rights-Civil Liberties Law Review 22, no. 1 (Winter 1987): 79-93.
- 99 New York State Senate, Office of State Senator Liz Krueger, "Home Stability Support Bill Moves Out of Senate Social Services Committee," Mar. 5, 2019.
- 100 HUD, "Length of Stay in Assisted Housing," October 2017.
- ¹⁰¹ New York City Housing Authority, "NYCHA 2019 Fact Sheet," March 2019.
- 102 Of the PSH population, 38.8% are over 50, and the share has been steadily rising. See HUD, "2017 Annual Homeless Assessment Report (AHAR)," pp. xxi, 7-3, 7-4, 7-5, and 7-11: "The share of long-term stayers living in PSH during the reporting year has increased every year between 2010 and 2017." The share of "more than five years" is up to 28.6%.
- ¹⁰³ National Academies, *Permanent Supportive Housing*, p. 111.
- 104 Culhane, "The Costs of Homelessness"; Culhane et al., "Accountability, Cost-Effectiveness, and Program Performance: Progress Since 1998," 2007 National Symposium on Homelessness Research, February 2008.
- 105 Kertesz et al., "Permanent Supportive Housing for Homeless People."
- ¹⁰⁶ HUD, "HUD 2018 Continuum of Care Homeless Assistance Programs," Nov. 13, 2018.
- "Letter to the Honorable Darrell Issa," HUD, Aug. 9, 2017, p. 2: "Housing First models help people move quickly from homelessness to permanent housing, and then leverage the housing to serve as a platform for meeting other goals such as education, employment, and recovery. The combination of housing stability and a robust set of consumer driven services help people improve their self-sufficiency and well-being. The services can include employment, education and career development, mental health, and substance abuse treatment and recovery supports."
- 108 USICH, "Strategies to Address the Intersection of the Opioid Crisis and Homelessness," February 2017.
- 109 Rankin, "Punishing Homelessness."
- 110 Kertesz and Johnson, "Housing First: Lessons from the United States."
- 111 CEA, "State of Homelessness," p. 24.
- National Academies, *Permanent Supportive Housing*: "[E]ven though supportive housing models have been found to decrease the number of days spent homeless ... for individuals with serious mental illness and/or substance use, this has not translated to significant improvements in mental health status in most studies," p. 48, and chap. 9 generally; Rog, "Permanent Supporting Housing," p. 292: "[The] majority of studies ... found no effect of permanent supportive housing on psychological symptoms or alcohol or drug use"; Tsai, Mares, and Rosenheck, "A Multi-Site Comparison of Supported Housing," p. 20: "[N]o differences were found on psychiatric, substance abuse, or community adjustment outcomes"; Jack Tsai and Robert A. Rosenheck, "Considering Alternatives to the Housing First Model," *European Journal of Homelessness* 6, no. 2 (December 2012): 203: "Housing First, along with less clearly defined permanent supported housing programmes, have primarily shown success in housing outcomes, with minor or no improvements observed in clinical, social, and quality of life outcomes."
- ¹¹³ Padgett, Henwood, and Tsemberis, Housing First, chap. 4.
- 114 Sam Tsemberis, Leyla Gulcur, and Maria Nakae, "Housing First, Consumer Choice, and Harm Reduction for Homeless Individuals with a Dual Diagnosis," *American Journal of Public Health* 94, no. 4 (May 2004): 652: "The program posits that providing a person with housing first creates a foundation on which the process of recovery can begin. Having a place of one's own may—in and of itself—serve as a motivator for consumers to refrain from drug and alcohol abuse"; and 655: "Providing housing first may motivate consumers to address their addictions to keep their housing, so that providing housing before treatment, may better initiate and sustain the recovery process"; National Alliance to End Homelessness, Fact Sheet,

- April 2016: "Housing First is a homeless assistance approach that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life."
- 115 Gubits, "Family Options Study: 3-Year Impacts," p. xx; USICH, "The Evidence Behind Approaches," p. 4, and "Home, Together," p. 23; National Academies, Permanent Supportive Housing, pp. 4, 13, 41, 50.
- ¹¹⁶ HUD, "FY 2019 CoC Program NOFA," July 2019, p. 1.
- 117 Gubits, "Family Options Study: 3-Year Impacts," exhibit 3-12, pp. 41-44.
- 118 Ibid.; Kevin C. Corinth, "What Should We Do About Homeless Families? Comments on the Family Options Study," American Enterprise Institute, August 2015.
- 119 Gubits, "Family Options Study: 3-Year Impacts," p. xxii: "Most family heads were not working at the time of random assignment (83 percent), and more than one-half had not worked for pay in the previous 6 months. The median annual household income of all families in the study at baseline was \$7 410."
- 120 Tsai and Rosenheck, "Considering Alternatives to the Housing First Model."
- 121 HUD, "2017 Annual Homeless Assessment Report," October 2018, p. 1-11: "People experiencing sheltered homelessness were 5.1 times more likely to be by themselves than people in the total U.S. population (64.9% versus 12.8% have a household size of one person)."
- 122 Ridgway and Zipple, "The Paradigm Shift in Residential Services," p. 20: "a total environment made up of persons who have the status of deviants often results in social isolation. Even when such a setting is physically located in the community, residents may spend their time primarily in relation with their peers and lack interaction with the broader community."
- 123 ProPublica, Right to Fail, "New Documentary Chronicles the Challenges of New York's Supported Housing Program for People with Mental Illness," Feb. 20, 2019.
- 124 See ProPublica, "Right to Fail: For New Yorkers with Mental Illness, a Broken Promise."
- lulia Solomons, "Written Testimony of the Bronx Defenders: Re: Oversight-Preventing Recidivism for Individuals with Mental Illness and Int 0903In Relation to Funds Remaining in Inmate Accounts When Inmates Are Released," New York City Council, Joint Hearing: Committee on the Justice
 System and Committee on Health, Disabilities and Addiction, June 17, 2019, p. 6: "Not only are the barriers to successfully being placed in supportive
 housing significant, but once housed in one of the buildings run by a supportive housing agency, the conditions for this extremely vulnerable population
 are often not structured to result in long-term stability. We hear countless reports from our clients in supportive housing that they do not have regular,
 reliable access to the case management support that they are supposed to receive. Additionally, when they are struggling with issues directly related
 to their housing and safety, such as problems with another resident, they find it very difficult to get any assistance. The case management staff are
 often overworked and overburdened, and the bureaucracy that clients have to navigate in order to make any necessary changes to their housing is
 nearly impossible to achieve without extremely persistent advocacy. For example, we have had clients report that when they have a neighbor who is
 not on their medication and may be actively symptomatic and threatening to harm them, they receive little to no response on the part of the agency
 managing their housing. Requests to move units are in large part ignored but those that are not take far too long to happen, especially if a situation is
 acutely dangerous for that client and a threat to their stability. We also see this in situations where clients in recovery from substance use are placed in
 a housing site that, meaning they might have completed drug treatment and be in recovery but their neighbor is actively using drugs—a direct threat to
 their sobriety and therefore stability."
- Jack Tsai, Alvin S. Mares, and Robert A. Rosenheck, "Does Housing Chronically Homeless Adults Lead to Social Integration?" Psychiatric Services 63, no. 5 (May 2012): 427–34; Deborah Quilgars and Nicholas Pleace, "Housing First and Social Integration: A Realistic Aim?" Social Inclusion 4, no. 4 (2016): 5–15; Tom Baker and Joshua Evans, " 'Housing First' and the Changing Terrains of Homeless Governance," Geography Compass 10, no. 1 (2016): 25–41; Tsai and Rosenheck, "Considering Alternatives to the Housing First Model"; Kim Hopper, "The Counter-Reformation That Failed? A Commentary on the Mixed Legacy of Supported Housing," Psychiatric Services 63, no. 5 (May 2012): 461–63; Russell K. Schutt and Stephen M. Goldfinger, Homelessness, Housing, and Mental Illness (Cambridge, MA: Harvard University Press, 2011).
- Leyla Gulcur et al., "Community Integration of Adults with Psychiatric Disabilities and Histories of Homelessness," *Community Mental Health Journal*, 43, no. 3 (June 2007): 211–28; National Academies, *Permanent Supportive Housing*, pp. 51–53.
- 128 Samantha Batko et al., "Open Letter to Secretary Ben Carson, Joe Grogan and Robert Marbut," endhomelessness.org, Mar. 18, 2020.
- ¹²⁹ HUD, "HUD 2018 Continuum of Care Homeless Assistance Programs," Nov. 13, 2018.
- 130 Sonja Sharp, "16,000 People in L.A. Now Live in Cars, Vans and RVs. But Safe Parking Remains Elusive," Los Angeles Times, June 10, 2019.
- 131 Greg Berman and John Feinblatt, *Good Courts: The Case for Problem-Solving Justice* (New York: New Press, 2005). There are problem-solving courts designed specifically for the homeless: see California Association of Collaborative Courts (CCAC), Types of Collaborative Justice Courts.
- 132 Barrow and Zimmer, "Transitional Housing Services"; HUD, "Priority: Home!"
- 133 About 3,500 residential treatment facilities are in the U.S., almost 2,800 of which offer long-term treatment of more than 30 days' duration. See HHS, Substance Abuse and Mental Health Administration, "National Survey of Substance Abuse Treatment Services (N-SSATS): 2018 Data on Substance Abuse Treatment Facilities," table 2.3: All Facilities and Facilities with Opioid Treatment Programs (OTPs), by Type of Care Offered: Number and Percent, 2008–2018, September 2019.
- 134 "Justice," Joe Biden.com.
- 135 Ester Fuchs and William McAllister, "The Continuum of Care: A Report on the New Federal Policy to Address Homelessness," HUD, December 1996, pp. 4, 5, 9, 45, 49.
- HUD, Office of the Assistant Secretary for Community Planning and Development, "Notice of Funding Availability for Continuum of Care Homeless Assistance; Supportive Housing Program (SHP); Shelter Plus Care (S+C); Sec. 8 Moderate Rehabilitation Single Room Occupancy Program for Homeless Individuals (SRO)," Federal Register 61, no. 52 (Mar. 15, 1996): 10867.
- ¹³⁷ "Letter to the Honorable Darrell Issa," HUD, Aug. 9, 2017.
- 138 See discussion in Byron Johnson, William H. Wubbenhorst, and Alfreda Alvarez, "Assessing the Faith-Based Response to Homelessness in America: Findings from Eleven Cities," Program on Prosocial Behavior, Baylor Institute for Studies of Religion, Feb. 1, 2017.
- 139 Community Housing Innovations, 2017–2018 Annual Report, Executive Director's Message.
- 140 "New Priority Means Fewer Beds in City Shelters," editorial, New York Times, May 17, 2016; Laura Nahimas, "HUD Slashes Funding for Some New York City Homeless Shelters," Politico, May 9, 2016.
- 141 HUD, "PIT and HIC Data Since 2007," January 2020.
- ¹⁴² California Senate Bill No. 1380, Chapter 847, Sept. 29, 2016.
- 143 Office of the White House, "President Donald J. Trump's Economic Mobility Reforms Will Restore Independence and Dignity to Millions of Americans," and "Executive Order Reducing Poverty in America by Promoting Opportunity and Economic Mobility," Apr. 10, 2018.

