

At our last meeting, several members of the committee asked HomeBase to answer a variety of pressing questions regarding the new safe haven permanent housing component of the Supportive Housing Program.

In an effort to gain federal insight into these matters, HomeBase convened a conference call with Steven Sachs and Karna Wong of HUD's San Francisco office, and Vanessa Barnard of HUD's Office of Special Needs Assistance Programs in Washington, DC. A representative from one of Nevada's continuums also joined the conference call.

The following synthesizes your questions from our previous meeting with a summary of Ms. Barnard's responses:

- **What are the realistic differences between regular Safe Havens and those with “permanent housing characteristics?”**
 - Currently, the primary distinguishing factor is the presence of a **leasing requirement** for permanent safe havens (see below);
 - HUD is devising additional “permanent housing characteristics” and more specific leasing guidelines, probably in time for 2003 NOFA;
 - HUD's goal is to find a **happy median** between meeting **statutory/regulatory requirements** (such as the 30% permanent housing mandate from Congress) and **servicing homeless individuals** with severe mental illness in a low-demand environment.

- **Does SH-PH qualify for the permanent housing incentive if new and ranked first?**
 - YES;
 - Permanent housing safe havens meet HUD's goal of addressing chronic homelessness, while fulfilling the 30% permanent housing directive from Congress.

- **Can one really maintain the SH low-demand concept, while still getting the permanent housing incentive?**
 - In short, yes;
 - HUD's feeling is that flexibility in leasing terms and requirements will still allow case management centered on client needs in low-demand settings;
 - Lease requirement may constitute higher demand on participant, but HUD will be flexible to ensure that this does not become a barrier to low-demand service philosophy.

- **What does “characteristics of permanent housing” mean?**
 - Currently, the only characteristic required for a safe haven to be considered permanent is the lease requirement;
 - HUD is developing additional characteristics and leasing requirements;
 - Look for additional guidance in the 2003 NOFA.

- **Must SH serve only persons with SMI? Is a diagnosis required? How can you really require a diagnosis given the low-demand nature of SH? Can you serve other (non-SMI) populations at the same time, such as SA? How strict is HUD on this issue?**
 - Yes, a diagnosis of Severely Mentally Ill is required for safe haven participants;
 - Diagnosis does not have to be made by psychiatrist or doctor; program staff (e.g. nurses or counselors) may make this determination, if necessary – HUD trying not to be too strict on diagnosis requirements;
 - Dually-diagnosed patients may participate in safe haven programs, as long as they are severely mentally ill.

- **What kind of lease does HUD require for a SH-PH project? Month-to-month OK? Week-to-week? Other forms of lease?**
 - Lease may be annual or month-to-month; week-to-week is probably acceptable as well, but Ms. Barnard indicated she would need to clarify with HUD Counsel;
 - Any lease conforming with HUD leasing requirements in Federal Register should be acceptable;
 - Due to low-demand concept of safe havens, not everyone in program must always be signed onto a lease at all times;
 - Leasing requirement must be integral part of program, clearly identifiable to program auditors;
 - Signing a lease must be a goal for program participants, though HUD recognizes that not all safe haven residents will be immediately able to sign for variety of reasons;

- **How can a lease really work within the SH idea of moving people to the next stage housing? Could they move to a new (non-SH) space and keep the same lease?**
 - Goal of safe havens continues to be low-demand, “housing first” strategy;
 - Participants may be moved to permanent supportive housing after they begin to trust program staff and feel able to move on to higher-demand setting;
 - Leases cannot be carried over from safe haven to permanent supportive housing; Greater service requirements in PSH require different type of lease, and APR reporting guidelines would require separate lease as well.

- **What forms of lease are being used by existing SH-PH programs? What language do they contain?**
 - This data is not yet available, as HUD is still reviewing proposals from 2002 NOFA;
 - John Rio of CSH, who has been working nationally with safe haven providers, may be able to provide some ideas of what 2002 applicants considered;
 - HUD has no official guidance at this time, but has agreed to fax an example of what a good lease agreement may embody.

- **Under a lease, must a SH-PH resident pay rent?**
 - Not necessarily;
 - Lease requirement would probably work similarly to current lease agreements in permanent supportive housing programs, wherein a landlord may require rent at a rate of up to 30% of monthly income, but is not legally obligated to do so.

- **How do existing SH-PH programs deal with landlord-tenant issues that arise with a lease, especially given the low-demand nature of the program?**
 - This issue has not yet arisen, as HUD has not yet funded any permanent housing safe haven programs;
 - Again, HUD wishes to emphasize low-demand nature of safe havens;
 - HUD will be considering this issue as it develops permanent housing safe haven guidance;
 - Tenant-landlord issues are generally subject to applicable state law.

- **Are there any noteworthy SH-PH programs around the country (five or so) that we could contact to get information and feedback on the above SH-PH program and lease issues?**
 - At this time, HUD is still reviewing 2002 applications;
 - Until 2002 funding announcement, there are no programs to be contacted;
 - John Rio of CSH may be able to provide some information on 2002 applicants, but there is no official word from HUD at this time.

- **If SH doesn't quite fit, could they try an Innovative Supportive Housing Program? Could ISH qualify for the permanent housing incentive? What specifically does HUD require to approve an ISH proposal? Worth trying?**
 - ISH programs are classified only as transitional housing, and **cannot** qualify for permanent housing incentive;
 - Without permanent housing incentive, ISH not particularly useful to many continuums;
 - Burden to prove that a program is innovative is very high;
 - Most ISH applications are rejected or re-classified due to this high burden.