

## MEMORANDUM

TO: Regional Steering Committee On Homelessness and Housing

FROM: HomeBase

RE: Homelessness & the Economic Crisis: the Actual Impact—What’s the Bottom Line?

DATE: October 17, 2008

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### **Background**

The Regional Steering Committee (“RSC”) most recently covered budget-related topics during its last meeting, in July 2008. The RSC regularly discusses state and federal budgets and assesses their impacts on work addressing homelessness. Some of the meetings that covered this were in March 2006, March and July 2005, and July and September 2004. We covered election-related issues in conjunction with budget updates during the November 2004 meeting. The RSC most recently directly addressed CDBG issues in July 2006 and March 2005. We discussed advocacy efforts related to securing funding for services to homeless people in housing in March 2004.

### **Current Economic Crises: Impacts on Homelessness**

This memo will provide an introductory look at the current economic crisis and its impacts on local governments and homeless housing and service providers. It suggests questions to ask in local government and providers’ risk planning, provides examples of responses to address some of these impacts, and proposes additional ways of responding.

#### CONTEXT: OVERALL ECONOMIC CRISIS

The economic crisis that began with sub-prime mortgages has spread to other parts of the financial and mainstream sectors. It has affected the overall financial markets, banks, federal government budgets, state government budgets, and local government budgets. With the drop in housing prices, revenue has decreased at government levels, resulting in budget cuts for many housing and service providers. It has also affected the credit market, making it more difficult for individuals, businesses, municipalities, and nonprofit organizations to borrow money<sup>i</sup> to support operations. Unemployment has risen because of trickle-down effects of the squeeze on businesses and consumers.

In California specifically, housing prices have dropped dramatically, an estimated 32% this year,<sup>ii</sup> and are expected to drop another 6% next year. This has resulted in many property owners having outstanding mortgages that exceed their equities in their properties. At the same time, the monthly payments due on the mortgages exceed the amounts many borrowers can pay. This is particularly true for sub-prime and adjustable rate mortgages, both of which are common in California. Foreclosures have spiked and are expected to continue through at least the end of next year, unless policies take effect to address the payment imbalance.

“[T]he number of empty homes is hovering near the highest level in more than half a century.”<sup>iii</sup> “As of June, 2.8 percent of homes previously occupied by an owner were vacant. Nearly 1 in 10 rentals was without a tenant. Both numbers are near their highest levels since 1956, the earliest year for which the Census Bureau has such data.

At the same time, the number of people who are losing jobs or seeing their incomes decline is rising. The unemployment rate has climbed to 6.1 percent, from 4.4 percent at the end of 2007, and wages for those who still have a job have barely kept up with inflation.”<sup>iv</sup>

Some experts like the current FDIC Chair do not believe the financial crisis can begin to be solved without addressing the foreclosure problem, the “root of the crisis.”<sup>v</sup>

#### IMPACT ON HOMELESSNESS: INCREASED NEED

Initial reports indicate that the financial markets and housing crisis has led to an increase in the number of individuals and families seeking services and housing provided by “safety net” and “below the safety net” providers. This includes government benefits and services like unemployment benefits. It also includes soup kitchens, emergency shelters, and transitional housing programs. A representative from Catholic Charities USA, the nation’s largest private network of social service agencies, has stated that “foreclosure is causing a significant increase in homelessness within our network all across the country.”<sup>vi</sup> Some communities are tracking the increase in the number of clients served and increases in their programs’ waiting lists, as well as the any changes to their client profiles.

Locally, providers have reported substantial increases to their waiting lists and difficulty placing the most needy clients in housing.<sup>vii</sup> For example, San Francisco’s family shelter waiting list is double the size it was last year and is now the longest family shelter waiting list in the last 10 years.<sup>viii</sup> The medical priority list is longer than it has been in the history of the family shelter system.<sup>ix</sup>

#### IMPACT ON HOMELESSNESS: CHANGES IN CLIENT POPULATION

Many communities are reporting that the demographics of the clients they are seeing is changing. They are seeing more low-income families, seniors, minorities, immigrants, and others who had been among the working poor. This has stretched their capacities to serve other homeless clients, many of who had special needs like disabilities, substance abuse, and mental illness.

A National League of Cities poll of cities across the U.S. found that the “housing crisis disproportionately impacting certain residents [like]...lower-income families[,]...families headed by single parents[,]...seniors[,] and people of color.”<sup>x</sup> In St. Paul, Minnesota, homeless families are increasingly seeking emergency shelter, with as many clients seeking shelter in 9 months as shelters would have seen for an entire year.<sup>xi</sup>

*Have you seen an overall increase in clients seeking housing or services?*

*Are you seeing increases of specific sub-populations?*

*If so, which ones? (E.g., seniors, families, renters, those relying on SSI)*

#### IMPACTS ON HOMELESSNESS: FUNDING CUTS, VERY HIGH BORROWING COSTS

Many providers with significant funding from local government have seen or can expect funding cuts. California cities and counties are also struggling with decreased revenue from lower property and other taxes (i.e., sales). Programs with significant local discretionary funding, like those receiving general funds, should anticipate funding cuts. Santa Clara County's Administrator is anticipating funding cuts to all programs that do not generate revenue, such as alcohol and drug treatment, preventative, and mental health programs.<sup>xii</sup>

California has had extensive budget cuts resulting in substantial decreases in funding for homeless services and housing programs. Governor Schwarzenegger used his line-item veto power to eliminate funding for several key housing programs, including the Emergency Housing and Assistance Program (EHAP)'s operations funding and a state tax rebate program for seniors that helps pay rent.<sup>xiii</sup> EHAP funds provided "facility operating grants for emergency shelters, transitional housing projects, and supportive services for homeless individuals and families."<sup>xiv</sup> Housing California has done an informal survey and determined that, with only 23 of 119 providers' responses so far, at least 9,255 Californians will not receive shelter or services as a result of the EHAP cut.<sup>xv</sup>

In addition, the credit crisis turmoil has resulted in municipalities having an extremely difficult time borrowing money. Municipal bonds have been used to fund affordable housing and cover operating expenses. In general, raising new debt (i.e., short term, long term, corporate, municipal) is extremely difficult. Cost of debt in most cases is at all time highs<sup>xvi</sup> or the highest in at least two decades,<sup>xvii</sup> and many have been shut out of the market completely or face skyrocketing borrowing costs. Municipal bonds' marketability has been hurt because many institutional investors can only buy the highest-rated bonds and municipalities had only been able to achieve this high rating with insurance protection, which is now difficult to obtain, against their default.

California currently is borrowing money in the credit market to cover a lag between revenue receipt and expense payouts. Its initial efforts seem to be succeeding so far,<sup>xviii</sup> but the state will face additional extensive budget cuts if they cannot borrow the \$7 billion necessary to bridge their revenue gap. Even if they do succeed, the very high borrowing costs<sup>xix</sup> will result in other cuts as revenue is diverted to pay the borrowing

costs. “In most states, payment of debt service on state general obligations essentially has a first claim on state revenues.”<sup>xx</sup>

This may otherwise affect local homeless programs because local governments also issue municipal bonds to cover operating expenses and other projects. Sonoma County, Berkeley, Contra Costa County, and San Jose Redevelopment Agency Multifamily Housing program are planning on borrowing using the municipal bond market in the next few months.<sup>xxi</sup> Local affordable housing finance done through the Association of Bay Area Governments (“ABAG”)’s Finance Authority and Multifamily Housing Finance Program<sup>xxii</sup> may also be affected.

## **Risk Assessment: Anticipating Funding Cuts, Budget Planning**

### FUNDING RISK ASSESSMENT

To prevent the loss of existing funding streams, it is necessary to do a risk assessment of current and expected future levels of funding. For the current and planned programs,

- What are the main sources of funding?
- Who provides the funding
  - Government: federal, state, local
  - Private: foundations, businesses, individuals
- What are the risks associated with these types of funding?
  - Government funding:
    - ♣ Mandatory or discretionary funding stream (e.g., local general funds more likely to be discretionary, pass-throughs from state more likely to be mandatory)
      - Are pass-through funds discretionary at the next level authorizing them?
    - ♣ New or longstanding program
    - ♣ Number of partners/supports mobilized around
    - ♣ Funding reliant on future bond initiatives
  - Private funding
    - ♣ Prepaid or committed private funding
    - ♣ Size of private funding organization
    - ♣ Number and size of private individual contributions
    - ♣ Private foundation funds has market risk?
  - Assess and anticipate any future funding cuts
    - ♣ Are they likely?
    - ♣ Which programs?
    - ♣ How much?
    - ♣ What is your plan if these cuts are made?
- Who makes budgeting/allocating decisions for these funds?
- How can I make these funding streams more sustainable?
- How can I be more competitive?
  - Use data and HMIS
    - ♣ Show increased number of clients
    - ♣ Show outcomes/results/successes
    - ♣ Demonstrate need/cost efficiency

- What are key allies in advocacy efforts?
  - Other organizations receiving this funding
  - Legislative and community champions
  - Other organizations/businesses with whom there are shared interests
- How can I generate media interest?
  - Clients who want to share their stories—many personal profile stories in the news, but not as many about homelessness
  - Use data and HMIS to support—show that more than just a few people affecting
  - Series of articles—writers who may already have an interest in this topic or who have already written stories about homelessness

### **Ways to Respond: Budget Planning**

#### *Financial Management Advice for Nonprofits*

During unexpected financial times, nonprofits may be better positioned to weather crises by maintaining good cash flow. Some ways to assist this include the following:

- Cash reserves—3 months
- Line of credits (if possible)
  - BUT note that economic crisis has led to line of credit cuts
  - Know the risk profile of your lender (bank failures, etc.)
- Regular invoicing
- Prepayments of funds coming to you, regular pledges
- Stagger payments to vendors—try to pay on 30 day basis
- Budgets: review and revise at least at 6 months, 9 months and with major changes (i.e., unexpected cut)

### **Ways to Respond: Maximizing Coordination Efforts to Achieve Economies of Scale**

The financial difficulties make it more important for communities and homeless providers to maintain their focus on leveraging funding. They should seek to achieve economies of scale and partnerships to the maximum extent possible.

A recent Collaboration Summit in San Luis Obispo County (see [www.collaborationslo.org](http://www.collaborationslo.org) for additional information) provides a model for community gatherings to address nonprofit funding decreases and improve coordination. A local foundation put together a Countywide gathering to constructively confront the California budget crisis. The main focus was on cooperation and collaboration. Participants were able to determine ways they could assist each other, such as sharing back office and administering functions. Self-led ongoing work groups devoted to major participant issues are continuing and a website has been set up to assist in this.

### **Ways to Respond: Opportunities Related to the Housing Crisis**

Providers should be aware of new and potential funding opportunities being developed to assist communities in dealing with foreclosures. It seems most relevant for nonprofits and housing developers to consider utilizing their agency-owned and master-leasing expertise to maintain foreclosed houses for community and use existing housing

inventory to expand available affordable housing for homeless and other low-income people.

Since the government will likely need to step in to address foreclosures, either directly by owning the underlying defaulted mortgages and related property, or indirectly by purchasing shares in the lenders that now own properties as a result of default, we should consider existing mechanisms to deal with government property. One such model is declaring these properties federal surplus properties and using the existing base conversion mechanism to distribute or purchase properties. This would entail having Local Reuse Authorities to plan for the properties' use, including creating plans for property to convey to homeless providers.

Homeless and nonprofit providers could support an expanded rental market for people in poverty. Nonprofit homeless agencies could use their master-leasing expertise to become landlords or property managers. The agencies could purchase the properties and lease them to clients. Some local examples of those with this expertise are Rubicon, Anka, the Greater Richmond Interfaith Program, and Shelter Inc.

To support ideas like this, it would be important to develop advocacy efforts for a federal mandate, local mechanisms, and tax credits or other preferences for nonprofits to allow them to purchase at least some of foreclosed homes.

Some existing government programs could be expanded and adapted:

#### NEW FEDERAL PROGRAM: NEIGHBORHOOD STABILIZATION PROGRAM

A new HUD program, the Neighborhood Stabilization Program (“NSP”), has allocated almost \$4 billion in one-time funding<sup>xxiii</sup> towards purchasing foreclosed properties.<sup>xxiv</sup> “At least 25 percent of the funding provided under the program must benefit very low income people. Several communities are considering using funding for permanent supportive housing or to provide housing to homeless people.”<sup>xxv</sup>

Funding was allocated as a special Community Development Block Grant (CDBG) allotment using a formula based on the number of foreclosures in a community.<sup>xxvi</sup> The funding was allocated using a formula based on

- The number and percentage of home foreclosures
- The number and percentage of homes financed by sub-prime mortgages
- The number and percentage of homes in default or delinquency<sup>xxvii</sup>

CDBG grantees, including cities, counties, and states, will receive funding and must submit an action plan by December 1 describing how they will use funds.<sup>xxviii</sup>

Eligible uses include:

- Establishing financing mechanisms for purchase and redevelopment of foreclosed homes and residential properties;
- Purchasing and rehabilitating homes and residential properties that have been abandoned or foreclosed, in order to sell, rent, or redevelop them;

- Establishing land banks for homes that have been foreclosed upon;
- Demolishing blighted structures; and
- Redeveloping demolished or vacant properties.

Providers, advocates, and others interested in using funds to assist homeless people should work with the CDBC staff in their jurisdiction.<sup>»xxix</sup> “HUD Deputy Chief of Staff Anoop Prakash ... advised attendees to ‘think smartly about partnership’ and align their mission, goals, and outcomes at the community level.”<sup>»xxx</sup>

“In a Federal Register notice published Monday, HUD announced allocations to states and communities and application procedures which include a December 1 deadline for submission of a substantial amendment to their currently approved annual action plan. Once the NPS amendment has been approved, funds must be obligated within 18 months. The Notice also explains that ‘because this funding is one-time funding and the eligible activities under the program are different enough from the regular (CDBG) program, HUD believes that a grantee must receive a minimum amount of \$2 million to have adequate staffing to properly administer the program effectively. In addition, fewer grants will allow HUD staff to more effectively monitor grantees to ensure proper implementation of the program and reduce the risk for fraud, waste, and abuse.’ For entitlement cities and urban counties that would otherwise receive an NSP allocation of less than \$2 million, the funds are allocated to the state grantee.”<sup>»xxxi</sup>

#### *Eligible Local Communities*

\$529.6 million in this program’s funding is directed to California, with \$ for Northern California communities. Eligible local communities include Alameda County, Antioch, Contra Costa County, Elk Grove, Oakland, Richmond, Sacramento, Sacramento County, San Jose, and Vallejo. \$145 million is allocated for eligible communities that receive CDBG funds through the state.

#### *Inquiries, Deadlines, and Actions*

Interested providers in eligible local communities and communities should determine:

- Appropriate County contact and assist if necessary—many housing officials in California counties with the highest concentrations of foreclosed properties were concerned that they did not have the staff to make use of the funding<sup>»xxxi</sup>
- Information on the process for amending the community’s annual action plan
- Local deadlines that may be prior to the December 1<sup>st</sup> federal deadline

*Have you heard about the NSP process in your community?*

*Would your Continuum of Care or local homeless providers be interested in utilizing this program?*

*What challenges in applying for and utilizing these funds would your:  
-local government face?*

*-local homeless providers face?*

*What assistance would help them address these challenges?*

#### CALIFORNIA PROGRAM POTENTIAL: EXPAND CALHFA COMMUNITY STABILIZATION HOME LOAN PROGRAM (CSHLP) TO MULTI-FAMILIES AND ALLOW NONPROFITS TO MASTER LEASE VACANT HOMES

Currently California has a similar program to subsidize the purchase of “vacant homes that are owned by participating financial institutions in certain areas of California to help hard-hit communities get back on their feet during these turbulent times.”<sup>xxxiii</sup> The property must be in “a selected REO from one of the participating financial institution or seller/servicers. Those include: Wells Fargo Premiere, Citibank and its affiliates, HomeEq Servicing, and Fannie Mae.”<sup>xxxiv</sup> A “Current Property List” is maintained on the website with addresses and locations of eligible foreclosed homes, in areas including cities in Alameda, Contra Costa, Sacramento, and Monterey Counties.<sup>xxxv</sup>

This program currently is primarily for low- and moderate-income first-time homebuyers. However, it could be applied to CalHFA’s other multifamily financing programs like the Special Needs Financing and Mental Health Services Act Programs to assist nonprofit organizations and others in the development of affordable housing. These organizations and others developing supportive housing for homeless people could serve the same purpose outlined above in helping hard-hit communities to maintain vacant housing, while at the same time fulfilling their commitments to increase the available stock of affordable housing, particularly for homeless and special needs populations.

#### **Ways to Respond: Increase Advocacy Efforts**

RSC members may want to increase advocacy efforts directed at (1) expanding existing and new programs like the CSHLP above to fit homeless housing and service provider opportunities; (2) preventing the loss of existing funding streams; (3) and tying in homeless prevention work more generally into the discussion of foreclosure-directed efforts.

*Should the RSC begin or join advocacy efforts on any of these issues?*

*What steps should the RSC take?*

*What information or other support would assist RSC members in doing this?*

### **Ways to Respond: Foreclosure-Related Examples**

A recent study has found that nonprofits and governments primarily are dealing with the ramifications of foreclosures and providing foreclosure prevention strategies. Some communities are trying out new or adapting existing approaches in dealing with foreclosure-related issues:

- *Cook County, IL:* The Sheriff's Office had suspended foreclosure evictions. The Sheriff was concerned that many of the people being evicted are renters unaware that their landlords have failed to pay the landlords' mortgages.<sup>xxxvi</sup> The Sheriff will begin resuming evictions with stringent legal safeguards the courts worked out. For example, a bank foreclosing on a rental property "must prove it informed all tenants of a state-mandated grace designed to allow them to look for new housing."<sup>xxxvii</sup>
- *Philadelphia, PA:* The Philadelphia city government and Philadelphia Court of Common Pleas are pursuing a joint mediation-like approach, the Philadelphia Residential Mortgage Diversion Pilot Program. It requires all owner-occupied properties scheduled to be foreclosed and sold by the Sheriff's Office to have their mortgages reviewed by borrowers, lenders, court before they can be sold. The goal is to seek agreements that allow loans to be modified so borrowers can resume regular payments & remain in their homes
- *Ramsey and Hennepin Counties, Minnesota:* Homeless families are increasingly seeking emergency shelter, with as many clients seeking shelter in 9 months as shelters would have seen for an entire year, in St. Paul.<sup>xxxviii</sup> The Minnesota Housing Finance Agency called in providers from Ramsey and Hennepin Counties to determine the effects of foreclosures on homelessness and appropriate steps. "[T]he state agency is developing a questionnaire that workers can give to homeless people seeking shelter to better pinpoint the effects of foreclosures ...to better prepare for a likely increase in demand from displaced families...and to find out if they should be lobbying for more help for apartment owners facing foreclosure."<sup>xxxix</sup> The Hennepin County task force on foreclosures has a series of recommendations to help tenants,<sup>xl</sup> and suggests that tenants know their rights. "The County Sheriff's Office is starting to develop a rights fact sheet for renters that can be delivered when they get notice of a sheriff's sale. But it will take a change in state law to require civil servers, who deliver most of the sale notices, to give renters more than the official notice."<sup>xli</sup>

- Other counties like Sacramento are assessing the cost of time the Sheriff spends in dealing with foreclosures.
- A New York Times Neediest Cases Fund program “will help dozens of families at risk of losing their homes to foreclosure from becoming homeless by awarding grants to pay for moving costs, the first month’s rent and the security deposit at their new apartments and other emergency expenses. Each eligible family can receive up to \$10,000 as part of the Subprime Neediest Program. The grants, available to homeowners as well as tenants whose landlords face foreclosure, will be awarded to families from around the metropolitan region in the next several months. The program is being funded by \$1 million from the endowment of the Neediest Cases Fund.”<sup>xlii</sup>

### **Conclusion**

The economic turbulence and recession are likely to cause significant challenges to homeless providers and local governments. This memo sought to provide an introductory look at events and responses to address impacts. The RSC will continue to monitor events, analyze proposals, and look to develop best practices for communities.

*What Strategies are You Pursuing in Dealing with Impacts of the Financial Crisis and Budget Cuts?*

*Have you had to make tough choices in serving existing or new clients?*

*If you are serving a substantial number of new clients, are you concerned about diluting your ability to serve your existing clients or target populations?*

*For further information, please contact Joni Canada, HomeBase Staff Attorney, at [joni@homebaseccc.org](mailto:joni@homebaseccc.org) or (415) 788-7961, extension 320.*

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- <sup>i</sup> NY TIMES. Story, Louise and Eric Dash. *Banks are Likely to Hold Tight to Bailout Money*. October 16, 2008, available at [http://www.nytimes.com/2008/10/17/business/17bank.html?\\_r=1&hp&oref=slogin](http://www.nytimes.com/2008/10/17/business/17bank.html?_r=1&hp&oref=slogin)
- <sup>ii</sup> National Public Radio, Morning Edition, October 16, 2008.
- <sup>iii</sup> NY TIMES. Bajaj, Vikas. *Home Prices Seem Far From Bottom*. October 15, 2008, available at <http://www.nytimes.com/2008/10/16/business/economy/16housing.html?hp>
- <sup>iv</sup> *Id.*
- <sup>v</sup> WALL STREET JOURNAL. Paletta, Damien. *FDIC Chief Raps Rescue for Helping Banks Over Homeowners*. October 16, 2008
- <sup>vi</sup> STAR TRIBUNE. Brandt, Steve and Warren Wolfe. *Oct. 29: Wave of Foreclosures Hits Renters*. November 5, 2007 (quoting Jane Stensen, senior director for human services at Catholic Charities USA)
- <sup>vii</sup> Phone interview with Suzan Sweet, Executive Director, Gilead House.
- <sup>viii</sup> Ochoa, Juan A. *Family Shelter System in Crisis*. Compass Community Services. September 24, 2008.
- <sup>ix</sup> *Id.*
- <sup>x</sup> Foreclosure to Homelessness: the Forgotten Victims of the Subprime Crisis, National Coalition for the Homeless, pg. 15, April 15, 2008, citing Appel, Sherry Conway. Foreclosure Taking Big Toll on Cities and City Finances. National Coalition of Cities
- <sup>xi</sup> STAR TRIBUNE. Brandt, Steve and Warren Wolfe. *Oct. 29: Wave of Foreclosures Hits Renters*. November 5, 2007.
- <sup>xii</sup> KQED, Morning Edition, October 17, 2008
- <sup>xiii</sup> Housing California, *Housing Needs of California's Most Vulnerable Hardest Hit by Governor Schwarzenegger's Cuts, Vetoes*. October 8, 2008, available at <http://www.housingca.org>
- <sup>xiv</sup> HCD, EHAP, available at <http://www.hcd.ca.gov/fa/ehap/>
- <sup>xv</sup> *Id.* at xiii
- <sup>xvi</sup> Friedlander, George. *Municipal Market Comment: Unusual Muni Values Finally Begin to Attract Buyers*. Citi Smith Barney. October 3, 2008. P. 1.
- <sup>xvii</sup> See Cooke, Jeremy R. *Munis Slide, Prompting Deal Delays; California Presses Ahead*. October 14, 2008, available at <http://www.bloomberg.com/apps/news?pid=20601009&sid=a1DPXfTRaibQ> (stating that municipal bond yields are
- <sup>xviii</sup> SAN FRANCISCO CHRONICLE. *Calif. Treasurer Bumps Note Sales to \$4.5B*. October 15, 2008.
- <sup>xix</sup> See BLOOMBERG NEWS. Marois, Michael B. *California Boosts Notes Sale; Yields Lure Individuals*. October 18, 2008 (stating that California's short-term note yields were as much as 0.88 percentage points higher above what California paid last year)
- <sup>xx</sup> Friedlander, George. *Municipal Market Comment: AAA Municipal Yields Reach Distended Levels*. Citi Smith Barney. October 14, 2008. P. 4.

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- <sup>xxi</sup> Upcoming municipal bond issuances can be searched at FINRA Investors, Market Data, <http://cxa.marketwatch.com/finra/BondCenter/Default.aspx>
- <sup>xxii</sup> ABAG, Financial Services, *available at* <http://www.abag.ca.gov/services/finance/about/about.htm>
- <sup>xxiii</sup> U.S. Interagency Council on Homelessness website, *10 YEAR PLAN EFFORTS CAN BENEFIT FROM NEW \$3.9B NEIGHBORHOOD STABILIZATION PROGRAM RESOURCES*, *available at* <http://www.ich.gov/>
- <sup>xxiv</sup> Alliance Online News. *HUD Announces New Housing Funding*. October 14, 2008.
- <sup>xxv</sup> *Id.*
- <sup>xxvi</sup> *Id.*
- <sup>xxvii</sup> HCD, H3221 CDBG Foreclosure Information, *available at* <http://www.hcd.ca.gov/HR3221OnePage.pdf>
- <sup>xxviii</sup> *Id.* at xxv
- <sup>xxix</sup> *Id.*
- <sup>xxx</sup> U.S. Interagency Council on Homelessness website, *10 YEAR PLAN EFFORTS CAN BENEFIT FROM NEW \$3.9B NEIGHBORHOOD STABILIZATION PROGRAM RESOURCES*, *available at* <http://www.ich.gov/>
- <sup>xxxi</sup> *Id.*
- <sup>xxxii</sup> L.A. TIMES. *Federal Foreclosure-Purchase Program May Fall Flat in California*. August 20, 2008.
- <sup>xxxiii</sup> CSHLP Frequently Asked Questions, *available at* <http://www.calhfa.ca.gov/homeownership/programs/cshlp.htm>
- <sup>xxxiv</sup> CSHLP, *available at* <http://www.calhfa.ca.gov/homeownership/programs/cshlp.htm>
- <sup>xxxv</sup> For a list of counties and zip codes, see <http://www.calhfa.ca.gov/homeownership/programs/cshlp.htm>. For a list of addresses, cities, and further property details, see [http://www.calhfa.ca.gov/homeownership/programs/cshlp\\_properties.pdf](http://www.calhfa.ca.gov/homeownership/programs/cshlp_properties.pdf)
- <sup>xxxvi</sup> CHICAGO SUN-TIMES. *Cook Co. Suspends Foreclosure Evictions*. October 8, 2008. *Available at* <http://www.suntimes.com/business/1208998.foreclosures100808.article>. See also Dart, Tom. CHICAGO SUN-TIMES. *Sheriff Dart Explains Why He Refuses to Evict Tenants*, October 9, 2008, *available at* <http://www.suntimes.com/news/otherviews/1211633,CST-NWS-evict09.article> (stating that, “[t]oo many times, our deputies arrive at a home to carry out a mortgage foreclosure eviction, only to find a tenant -- dutifully paying their rent each month -- who is unaware their landlord stopped using that rent money to pay the mortgage. They had no fair warning that they were about to be thrown out of their home. That's because, in many cases, the banks have done nothing to determine, in advance, who's living in the building -- even though it's required by state law. Instead, those banks expect taxpayers to pay for that investigative work for them”)
- <sup>xxxvii</sup> ASSOCIATED PRESS. Grass, Damian. *Renters in Foreclosed Homes Get Help*. October 16, 2008.
- <sup>xxxviii</sup> STAR TRIBUNE. Brandt, Steve and Warren Wolfe. *Oct. 29: Wave of Foreclosures Hits Renters*. November 5, 2007.
- <sup>xxxix</sup> *Id.*
- <sup>xl</sup> *Id.*

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<sup>xli</sup> *Id.*

<sup>xliii</sup> NY TIMES. *Helping to Keep Homelessness at Bay as Foreclosures Hit More Families.*

February 4, 2008, available at

[http://www.nytimes.com/2008/02/04/nyregion/04neediest.html?pagewanted=1&\\_r=1](http://www.nytimes.com/2008/02/04/nyregion/04neediest.html?pagewanted=1&_r=1)