

**Feedback on Homelessness Response Action Plan (HRAP) and
Intergovernmental Agreement (IGA); Alternative Governance Proposal
–Multnomah County Commissioner Sharon Meieran**

Introduction

Having read the HRAP and IGA multiple times, with a background as a lawyer, direct service provider, and policymaker, I still do not understand what the documents are trying to achieve. I can't even tell what aspect of homelessness is being addressed - unsheltered homelessness? Sheltered homelessness? People at risk of becoming homeless? Prevention of homelessness? Long term housing? The words used are confusing, numbers are represented inaccurately and inconsistently, the purported goals are all over the map, and it's not clear who is supposed to do what.

If the problem is not having a shared framework for a comprehensive functioning homelessness system (which I believe is a major problem), then concisely state this and describe and depict the proposed framework, explaining how what is proposed differs from the current system or what came before and failed.

If the problem is lack of effective governance, oversight, accountability, and coordination of a fragmented system with siloed responsibilities and funding streams (which I believe is a major problem), then state this clearly and then concisely explain the plan for attaining effective shared governance and oversight. Explain how what is proposed differs from the current system or what came before (particularly A Home For Everyone) and failed.

If the problem is the City wanting a specific "deliverable" in return for money they give to the County (which is the single thing that it seems like the IGA is trying to accomplish), then just say this and have a simple agreement that does not purport to be anything more than it really is. "In exchange for the City providing XXX funds to the JOHS, the County agrees to house or shelter 2699 people over the course of the next 1.5 years and will make available 445 new shelter beds that have not already been planned and/or invested in."

Multiple well-conceived and thoughtful plans attempting to collaboratively address homelessness through comprehensive, coordinated efforts between the City and County have failed over the past three decades as the situation on our streets has worsened. The HRAP offers the same rhetoric as the prior plans, but with a worse actual plan. If we invest massive amounts of time and energy in this misguided attempt to reinvent the wheel, we will end up three years further into failure, harming more people, wasting

tremendous resources, and squandering what little public trust we have left. The documents don't withstand basic scrutiny, and no one who has actually read them and considered them in the context of 40 years of prior failed plans should believe that they will lead to meaningful change. The documents must be personally reviewed with a critical eye and any questions fully addressed. To do less would be a disservice to the public.

Is meaningful change possible in our current system? Absolutely. Can a reasonable IGA be gleaned from what is proposed? I think so. By the end of June? Likely not, but I'm open to the possibility.

The City and County can adopt a path that can lead to foundational change, but only if we focus like a laser on three crucial elements:

1. Establish a single objective, independent, accountable leadership and governance structure directing homelessness policy, guided by expertise, best practices, and a holistic view of the homelessness system. Policy and planning should not be directed by elected officials. In fact, politics should be removed from the equation as much as possible. (The HRAP as written does the opposite.)
2. Clearly convey that the "joint" office of homeless services is exclusively a County department and not officially connected to the City. Neither an IGA nor an ordinance is needed to achieve this goal, and it needn't take two years. (The current proposed IGA makes this much more complex than it needs to be.)
3. Draft an IGA that has a narrow scope and focuses on what it can and wants to actually achieve. (The current proposed IGA does the opposite.)

Below, I will offer some constructive feedback for the HRAP and IGA as they currently exist. I believe that by adopting some of my proposed suggestions the documents could be improved. That being said, I do not believe that either document should be adopted, let alone pushed through on a rush basis.

I will conclude with an alternative approach that could be reasonably accomplished in a limited time frame and I hope you will consider this.

HRAP - I will go through the document page by page in order to provide some structure for my feedback.

First untitled section:

Problem: Right now the way the HRAP is written, the first two paragraphs seem to say that the main problem isn't homelessness itself, but having a dysfunctional system with no shared, comprehensive plan to address it. The HRAP then seems to list elements contributing to the dysfunction, but does so in a very confusing and rambling way.

Solution: Be clear and concise. Instead of run-on sentences with a bunch of digressive examples going on for paragraphs, just stick with the big picture: *The elements contributing to the dysfunction include lack of clarity in government and organizational roles and responsibilities; overlaps and gaps among local, state and regional entities; profound lack of affordable housing; lack of effective behavioral health systems and supports; lack of coordination among myriad entities engaged in homeless services; lack of reliable baseline data, information sharing platforms, data management, and data collection and analytic strategies; etc.*

Conclude this section with “*This Homelessness Response Action Plan offers (succinct summary of what the HRAP is actually supposed to do that responds directly to the problem that was identified)*” The way it’s currently stated is boastful (that’s how the term “ambitious” comes off, and that word is used in the previous plans that failed), but doesn’t actually address the problem that’s stated. Is the goal to align and coordinate? If so, that’s not a very impressive goal.

Problem Statement:

- **Problem:** Wasn’t the initial section the problem statement? It’s not clear what that untitled section is supposed to do vs. the “Problem Statement” section.

Solution: Be clear in differentiating these sections - if they both have to exist (which isn’t necessarily the case), then explain what each section is supposed to accomplish.

- **Problem:** The “Problem Statement” isn’t one. It basically says: Lots of people are homeless. Tons of them are living unsheltered. Tons more are in shelters or doubled up. Multnomah County has finite resources. What is lacking is a focused, coordinated and urgent strategy that (blah blah blah - words that seem like they’re trying to sound intelligent but aren’t used effectively or appropriately):
 - Number 1 literally doesn’t say anything.
 - Number 2 is policy speak that doesn’t say anything.
 - Number 3 doesn’t make sense - How does a strategy “Understand and define population segments”? I note the phrase “population segment” is used repeatedly in this document. There can be discrete populations defined by their shared characteristics, or sub-populations, or sectors of a population, or cohorts, but the

phrase “population segment” is distracting and doesn’t fit. It should be switched out throughout the HRAP and IGA.

- Number 4 uses a different format from the rest of the list. To be consistent it should just list what it will do - “Center racial equity.” Adding “at the forefront” to “center racial equity” is redundant. Either “place racial equity at the forefront” or “center racial equity.” This is basic grammar. Save further explanation until later or describe it in detail in a footnote.
- Number 5 doesn’t make sense. How does a strategy “Quantify the type of housing and shelter required to move individuals and population segments off the street or out of shelter into sustainable permanent housing”?
- Number 6 is a mishmash of words thrown together in a way that doesn’t make sense. Also, starting with “Strategically” when the lead-in is “What is lacking is a strategy that...” is redundant.
- Number 7 is a bunch of jargon that says nothing. Data in what sense? Outcomes about what?

The “problem statement” should be the heart of the plan. Instead this is a confusing bunch of words that don’t really say anything. I read the “Problem Statement” and I’m even less sure about the problem that needs solving than before reading the plan.

Solution: Try just saying what you mean in regular words. Do not refer to population “segments”. Use words correctly and consistently. Review rules of grammar. Avoid jargon.

Executive Summary:

General problem: This is not an executive summary.

Problems by paragraph:

- **Paragraph 1:** The first paragraph diminishes credibility by saying the PITC is “accurate”. Accuracy is defined as “free from error”, “correct”, or “in agreement with the truth”. The PITC has some arguably positive features, but accuracy is not one of them.

Solution: I recommend removing the word “accurate” - it only serves to undermine credibility.

- **Paragraph 2:** A lot of the numbers in this section are either misleading, inconsistent, or erroneous. The paragraph starts with the claim that the County’s “by name list” includes “11,153 people who were experiencing homelessness as of January 2024”. The paragraph

then proceeds to say that 2,558 of these names can't be accounted for. So why even mention 11,153 at all? It only serves to confuse.

Solution: Start with the “confirmed” 8,595 number, and then break that down clearly and concisely. **Suggestion:** *Efforts to improve data collection and accuracy have resulted in identification of 8,595 individuals whose housing status was reported and confirmed by service providers contracting with the County as of January 31, 2024. This included 5,398 people living unsheltered; 2,593 living in a (County? City? Other?) funded shelter; and 604 living in shelters not funded by (City, County, etc.).*

I would also clearly state the limitations of the list, which are many. *“We recognize this is a significant undercount, for a variety of reasons, but at least this provides a starting point to begin taking a more focused approach.”*

- **Paragraph 3:** This is one of the most important points for people to understand - the causes of and contributors to homelessness, and the categorization of different types of homelessness. This paragraph grossly oversimplifies and confuses the reality of what leads to and perpetuates homelessness.

Solution: This should be revised by someone who understands the complexity of homelessness and can break it down so that people reading the plan can make sense of it.

- **Paragraph 4:** This paragraph is embarrassingly confusing, overly simplistic, and inaccurate. When broken down, it essentially says: (1) As affordable housing supply decreases, whether due to increasing rent or fewer physical housing options compared with the population, more people are unable to get and retain housing. (2) The solution is having an adequate supply of affordable housing to meet people's needs. (3) Shelter and transitional “options” (whatever this means) are necessary to address “a homelessness crisis”, but not sufficient on their own to solve homelessness. (4) Moving people through transitional “settings” (?) and into housing is impaired by failing to provide them with the right services while in transition. (5) This results in a failure of our “system” (what system?) to achieve its “intended lasting outcomes” (what are these? These are never defined and not tied to any specific goal, population or system).

No one can argue the basics of supply and demand in relation to housing. With fewer physical housing units, more people needing the units, and escalating rent vs. income, of course we need more housing units and we need ways for people to be able to afford them. But the problem is much more complicated than just having affordable housing available. Homelessness can result from or be exacerbated by physical illness, mental illness, or addiction disorders; previous history of incarceration; racism; having support

needs due to aging; domestic violence; etc. And the reality is that once people become homeless, regardless of the underlying reason, they are exposed to trauma and stress that can lead to substance use and worsening of underlying mental health conditions. This can cause a further downward spiral of incarceration, risk of death and injury, and chronic inability to get or sustain housing. So the “solution” to homelessness is not simply “having an adequate supply of affordable housing,” because many people for valid reasons can’t simply move into housing. They require different types of housing that’s not only deeply affordable but provides the services and supports they actually need to get and stay housed.

In terms of shelter and transitional “options”, there seems to be no understanding of why these are necessary to “address” a homeless crisis. *There is no acknowledgement that shelter actually saves people’s lives while they are unhoused, as well as reducing their suffering, improving their dignity, and improving their and the public’s safety. This is the crux of why shelter is needed and yet it is completely ignored as part of the equation.*

In addition, shelter serves as a transition point to help people access services and skills needed to move into a better situation. The role of shelter is twofold - saving lives and helping people transition. What makes our failure to provide shelter not only ineffective but unconscionable is that letting people live unsheltered is essentially treating human beings like garbage and not addressing the humanitarian, public safety, and public health crises that have emerged as a result of our own failed policies.

In terms of the failures of the “system” leading to inability to transition people into housing and achieve the system’s “intended lasting outcomes”, I don’t even know what to say. How do systems “intend” outcomes? What are those outcomes? This sentence is absurd and seems like an attempt to deflect responsibility. Because we - local government - are the system. We have failed. And we’re about to do it again with this plan, but worse.

Solution: Revamp this paragraph completely. Break it down into multiple paragraphs if needed. Study homelessness or get the input of someone who is an expert in this work from a broad-based perspective rather than a single ideological viewpoint. Use common sense and regular language. Read it when you’re done and see if it actually makes sense and doesn’t seem offensive.

- **Paragraph 5:** Of course issues of behavioral health are inextricably linked to issues of homelessness. But this paragraph is just a hodgepodge of generic sentences that may be true when taken as stand-alone vague conceptual statements, but don’t fit together or tie into the bigger picture. It’s like this paragraph was just thrown in to try to sound intelligent because it referred to behavioral health, but the paragraph actually highlights

the lack of true understanding of the interconnection of homelessness (particularly chronic homelessness) and behavioral health.

Solution: Rewrite the paragraph with an attempt to address the shortcomings.

- **Paragraph 6:** This paragraph leaves out the basic tenets of solving homelessness (prevention, shelter, housing). What are “desired results”? Why single out behavioral healthcare rather than the myriad services and supports needed to get people housed and enable them to retain that housing? Was spellcheck used? The paragraph is poorly written, but I do agree with what I think is the underlying concept, so long as the basic tenets of homelessness are included.

Suggested revised paragraph: *No amount of housing, shelter, services or supports will “solve” homelessness in the context of our current fragmented and dysfunctional system, where service providers are too often unsupported and left to fend for themselves. We need an intentional approach to homelessness that coordinates the disconnected efforts and leads to a system that effectively prevents homelessness, keeps people safe if they do become homeless, and supports them as they transition into long term housing.*

Paragraph 7: I vehemently disagree with this paragraph and believe that it undermines the credibility of the entire HRAP. Suggesting that prior plans made “major strides”, identified “effective solutions” and “fostered system coordination” blatantly contradicts reality. Prior homelessness plans showed a far greater understanding of the complexity and scale of homelessness, and provided better approaches to solving it, with far more engagement, than what is contained in the HRAP. And yet these plans failed and things got worse. To suggest that the failure was a matter of scope and scale shows a fundamental lack of understanding of the homelessness system and what is needed to fix it. And, if the problem was only one of scope and scale, shouldn’t the HRAP simply advocate that we keep doing the same thing, just more of it? The problem is not about scale and scope. It’s about failed systems and leadership.

Solution: The only solution is to remove the paragraph entirely, or include a paragraph that incorporates a true analysis and understanding of the prior plans, an acknowledgement that they failed and we are now worse off, and, most importantly, that identifies *why* the plans failed so that we can fix the underlying problem(s).

Paragraph 8: This paragraph is mostly fluff that doesn’t say anything, but what it does say is inaccurate. Most fundamentally, it still doesn’t say what “system” needs fixing, or why this effort is any more coordinated or holistic than prior efforts which, if one reads the prior plans, were all more thoughtful, inclusive, and understandable than the HRAP.

The paragraph fails to explain why the HRAP will succeed when the other plans, incorporating virtually identical concepts, touting unprecedented collaboration and coordination, promising reductions in homelessness, describing plans for implementation, and elevating systems thinking, failed. If you can't answer this fundamental question, then the rest of the plan is built on a false foundation and will crumble.

Solution: Rewrite the paragraph and say the opposite.

Vision:

- **Problem:** A generic, vapid, uninspiring statement.

Solution: Rethink. Perhaps consider a vision where no one will die on our streets.

Guiding Principles:

Overarching problem: This section lists a bunch of generic principles. They're fine but offer nothing of substance. A college student writing a term paper on homelessness could have written this an hour before their project was due.

- *All people living in Multnomah County should have access to safe, stable and permanent housing*
Comment: Sure, can't argue with that.
- *A comprehensive strategy on homelessness should simultaneously address the need for temporary shelter and emergency services as well as permanent long-term housing*
Comment: Although generically fine, this "principle" seems to misunderstand the whole idea of what the word "comprehensive" means. It reduces homelessness to a binary model - we need to address BOTH shelter and housing - rather than addressing the complexity of the system and needing an intentional strategy that is truly comprehensive and puts all of the pieces of the puzzle together to create a meaningful whole.
- *Subject matter expertise, lived expertise and equity should be at the center of planning*
Comment: Again, it's hard to argue with the generic concept here. But look up the definition of "expertise". Lived "expertise" is not a thing. Lived experience, and wisdom stemming from lived experience, could be reasonable alternatives to use. Also, the fact that the initial person chosen to be the director of this new "system" possessed neither subject matter expertise nor lived experience would seem to undermine this core principle or at least suggest profound irony.

- ***Transparency and accountability for measured results should be a focus of spending and investments from all levels***

Comment: Transparency and accountability are essential, but it's hard to glean this message from the weird use of the passive voice in this sentence. Just say what you mean. And once you do, I would note that the principle is generic.

- ***Services to people experiencing homelessness should be person-centered and place the needs of the individual at their core***

Comment: Absolutely! Hard to argue against this concept. Unfortunately, the HRAP seems to do literally the opposite, making the “principle” seem disingenuous. The whole “theory of change” and program-based model is counter to the notion of putting people at the core. Systems and programs are not people. This is the only place where the concept of person-centered is. The way the supposed by name list is used is the opposite of a person-centered approach.

- ***Collaboration and a connected system for transitions is critical to navigating both behavioral health and housing systems to achieve lasting results***

Comment: SO generic. Collaboration by whom? A “connected system for transitions” of what? Critical to navigating by whom? I appreciate and support the concept (I think) but it is not well expressed.

- ***To every extent possible, investments should be aligned and synergistic, leveraging one another to make the highest possible use of every dollar***

Comment: Sure. Hard to disagree with that generic statement.

What's missing:

- **The first principle should be that we support the health, safety and dignity of people living in our County. People should not die because they are living unsheltered. Period.**
- **Highlight equity.**

Theory of Change:

- **Problem:** The concept is only defined in a footnote, and the footnote itself is confusing. Furthermore, the concept seems misapplied to the HRAP. It's like people wanting to sound like policy wonks are trying to inject buzzwords into a document that already doesn't make sense. If the “theory of change” concept is being appropriately applied, then so much context is missing that one can't understand how it all fits together into a

cohesive theory of change. If this is indeed the center of a plan, then clearly explain why and how..

In addition, the whole description counters what for me is the foundationally important concept of identifying individual needs and responding to them - changing our paradigm from program-centered to person-centered. Matching people to the services they actually need and supporting them through a connected and coordinated system. The “theory of change” as described seems very clinical and detached, and it doesn’t address the connections between all of the various fragmented aspects of the system. If a true theory of change model was applied to guide this process, it feels like there would have been a different result.

This whole section sounds contrived and doesn’t actually tell us anything meaningful. If anything, it undermines the HRAP as written because it feels so superficial and disconnected.

Solution: Start the paragraph by explaining what a “theory of change” is - not relegating it to a footnote or using phrases like “missing middle” that no one understands. My suggestion: *“A ‘theory of change’ is a methodology used to explain how identified outcomes will be achieved using focused interventions. It’s like a recipe for how we get from isolated ingredients - sugar, eggs, butter, flour, heat - to our desired result - a cake.”* The rest of the paragraph needs a lot of work to make it mean anything. I think it’s intended to say something like “For Multnomah County, we will identify populations at risk of or experiencing homelessness using data and analytics; we will identify evidence-based goals and interventions to achieve them for each of the populations; and then we will measure the outcomes to determine whether our interventions were successful in achieving our stated goals. We will do this while placing a premium on engagement, continuous improvement, and efficiency.”

- **Problem:** The second paragraph is distracting because it is so jargon-y and pretentious while saying nothing. Seems to be a catch-all paragraph to throw a bunch of buzzwords into.

Solution: Delete the paragraph.

- **Problem:** The “theory of change” seems like it’s supposed to be a fundamental element of the HRAP, yet it appears in a short paragraph in the middle of the document, seemingly at random, disconnected from any substance.

Solution: Iff the theory of change is a crucial aspect of the HRAP, include this in a meaningful way up front in the document, rather than having it randomly appear in a small stand-alone section in the middle.

Overarching Strategy:

1. **Paragraph 1, problem:** The paragraph states that “Of note, this approach is unique among recent local plans in its clear definition of end-goal outcomes: an improvement from merely measuring services delivered or the numbers of people served.” This is inaccurate on multiple levels.
 - First, prior plans actually *do* include clear end-goal outcomes. In fact, AHFE promised a deliverable of cutting unsheltered homelessness by 50% and doubling shelter capacity. Much like the HRAP. This raises the question of whether the authors of the HRAP actually read the prior plans.
 - The “clear definition of end goal outcomes” supposedly incorporated in the HRAP is misleading. This plan uses the same old approaches and outcomes, it just tries to disguise them with different or distracting words and numbers (further elaborated on below).
 - In terms of being an “improvement” from merely measuring services delivered or the numbers of people served”, the HRAP itself uses the exact approach it says needs to be improved on. It focuses on “outcomes” like “place 2700 people in shelter or housing” or “add 1,000 shelter beds”. This does nothing to actually intervene and demonstrably decrease homelessness or improve people’s lives.

I appreciate that a “key contributor” to the HRAP said to “Create an unrelenting priority, and organize around it.” But nothing in the HRAP screams “unrelenting priority!” I’m not sure what any of the priorities of the HRAP actually are.

Solution: Don’t say things that are misleading, distracting, or aren’t true.

2. **Paragraph 2, problem 1:** The first sentence is a totally convoluted way to say something straightforward. (It also uses the phrase “population segment” which I’ve already suggested be switched out). The paragraph says that “local and national data” suggest that subsets of the general population can be identified “around which interventions may be organized to achieve given outcomes.” What does this mean? It seems to basically just say “one could theoretically organize certain populations that one could theoretically intervene on.” The passive voice presents a problem here and the sentence as written is not something worth saying.

Solution: If the HRAP's overarching strategy is intended to devise focused interventions for specific populations, just say so and explain why.

Paragraph 2, problem 2: The list of populations itself is inconsistent and contains information that makes the presentation more confusing.

Solution: Simply provide a list of the populations then add footnote references to studies containing the "local and national data" already mentioned that explain why these populations are being highlighted. Don't add information in the list itself for some populations but not all, or add different types of information for different groups. It's confusing and distracting.

Outcomes:

This is perhaps the most problematic section of a plan that I see problems with in virtually every paragraph.

- **General concern:** The "outcomes" section leads with inaccurate and inconsistent data and misrepresents what a "by name list" is and how it should be used. The promise to cut unsheltered homelessness in half in less than two years is a shell game relying on City and County Commissioners, along with the public, failing to recognize that they're being scammed. Those proposing the HRAP seem to promise to reduce unsheltered homelessness by half because that's what people want to hear, but that is NOT what they're promising. So instead, they create the illusion that this is what they mean, but in reality promise something completely different, and then make no effort to correct the misunderstanding they created.

To understand the scam, it's essential to start with an understanding of what a true By Name List (BNL) is for people living unsheltered, and why it can be such an effective strategy. A BNL for people living unsheltered is built by proactively reaching out to people living unsheltered and understanding their individual housing needs and barriers. This information is used to guide investment in what people collectively need, and success is measured as individual people move into better situations and are removed from the list.

Unfortunately, the JOHS "list of names" fails to meet most of the criteria that make a BNL so effective. The JOHS list only includes people who have been served by a limited number of organizations contracting with the County. The list is passive and is not updated in real time. It is not based on proactively reaching out to obtain information from people living unsheltered (many of whom do not engage with any organization, let

alone one that is contracted by the County and happens to have access to the County's database). **The County's list is at best a gross undercount of people living unsheltered who have at some point used County-contracted services at inconsistent points in time.**

For the sake of argument, even assuming that the County's list is up to date and accurate, it is not used in the way that makes a BNL such an effective tool. It is used to obtain a number - in this case the number of people on the list as of January 31, 2024. After the number has been obtained, the list itself, and the people on it, become totally irrelevant. They are not targeted to receive services and what happens to them is not tracked. The only thing that is obtained from this "list" is a number.

Once the number is obtained, it is halved, and the resulting number is used to determine how many people the County promises to house or place in shelter. It doesn't say where they will come from, or whether they will need to retain their shelter or housing to be counted a "success". People newly homeless who can be rapidly housed or sheltered will be prioritized, and the chronically homeless - with serious mental illness, addiction or other disability - will remain unsheltered. This system does not incent changing anything for those who are most vulnerable.

Remember Housing Multnomah Now? That program promised to house or shelter 300 people living unsheltered within seven months. I believe they placed seven within that time period. I'm not sure how anyone could believe that this promise to place 2699 people is anything other than at best a shell game, at worst a lie.

Solution: Finally implement Built For Zero for real and create a true BNL! Hire a small team of outreach workers to deploy in an organized way to meet people where they're at and get information about who they are and their needs and barriers so that we can truly know how many people are living outside and understand how we can invest our resources most effectively. As you get those specific individuals into better situations, move them off the list until it's reduced by half.

Alternatively, when referring to the County's list, be honest - call it what it is and identify its shortcomings. Stop suggesting this is an accurate number of people living unsheltered or that we have any idea who they are. This is a lie.

- **Problems with "proposed outcomes":**
- **Proposed outcome 1:** The first "outcome" listed in the "Outcomes" section is "adopt clear, achievable goals with measurable outcomes."

Problem: Redundant. An outcome shouldn't be "adopt outcomes..."

Solution: Change the language and describe a real outcome. Alternatively, remove the sentence.

- **Proposed outcome 2:** "Reduce unsheltered homelessness for the following priority populations at a rate equal to or greater than that population's proportion of the overall population in the baseline number"

Problem: This doesn't make sense.

Solution: Explain.

- **Proposed outcome 3:** Increase "exits from adult shelter to permanent housing" by 15% by Dec. 31, 2025.

Problem: Currently, we do not know how many people are in shelter, how many exit to permanent housing, or what happens to them once they are in housing. The numbers we do have, which are unreliable at baseline, are pathetic: 13% of people in congregate shelter exit shelter to permanent housing and 26% exit all forms of shelter to permanent housing. Which type of "shelter" is this percentage increase referring to? Why was 15% chosen? What happens to the up to 87% of people who do not get placed into housing? How many people retain their housing after being placed from shelter? What will we do for the people not placed? You do not measure an accurate baseline for this number already, you are proposing to increase the unknown number by an arbitrary 15%, and you do not mention anything about what will happen to the vast majority of people who will not be placed from shelter into housing. This seems like a major problem.

Solution: Remove this or reframe it and address the questions/concerns.

- **Proposed outcome 4:** Ensure 75% of people housed in permanent supportive housing retain their housing 24 months after placement"

Problem: Who is included in the baseline number of people who are housed in supportive housing? Where will they be coming from? Are they placed in supportive housing from unsheltered homeless, from shelter, or from housing? How do you define "permanent supportive housing" in this context? How will you measure retention rates?

Solution: Remove this or reframe it and address the questions/concerns.

- **Proposed outcome 5:** End all behavioral health, health system or hospital discharges to the street by Dec. 31, 2025.

Problem: This does not seem feasible. Who was consulted to determine this "outcome"? I doubt that hospital systems, ER personnel, or others with any connection to hospital systems, health systems, or behavioral health centers, would think this is possible. This is a great aspirational goal, but it is literally impossible to be addressed in 1.5 years.

Suggesting this as an outcome shows a lack of understanding of health systems, ERs, and the crisis around behavioral health.

Solution: Please explain how you came up with this goal and who you circulated it with to determine it was reasonable.

- **Proposed outcome 6:** End discharges from corrections to the streets by 2026.

Problem: This seems like an unrealistic goal as well. I'd like to see any data or research suggesting this might be even remotely possible.

Solution: Provide the data.

Foundational Strategies to Accomplish Goals:

- **General problems:**

The first three “strategies” mentioned are not strategies at all. They are generic policy jargon that doesn't say anything meaningful to real people.

The subsequent “strategies” are not strategies either. They are statements of the obvious, described in the most generic ways possible.

Reading ahead, it seems like “strategies” 4-13 are actually purported “Goals” that are described in more detail later in the HRAP, so it's not clear why they are listed in this section.

- **Goals:**

As already mentioned, the “Goals” are generic and state the obvious. The identified short-, mid- and long-term “outcomes” identified in the Goals section are different from the outcomes listed in the Outcomes section, which is extremely confusing. The whole approach makes no sense. How do the outcomes in the Outcomes section tie to the goals and outcomes in the Goals section? How does any of this tie in to whatever the actual goal of this HRAP is (which I still can't identify)?

Conclusion:

I have repeatedly reviewed the goals, outcomes, and action items for the HRAP and here I've tried to raise questions and offer suggestions that might lead to an improved version. However, as I've previously stated, I believe the plan is fundamentally flawed. It is a generic, vague document seemingly trying to make up for its lack of substance by using buzzwords and jargon. It is built on a false foundation, uses inaccurate, inconsistent, unrealistic, and misleading numbers, and doesn't articulate a clear goal or purpose. It

feels like a recycled version of all the plans that have come before, but it's not as well thought out or conveyed, and there is no explanation of why it's different and will succeed when all prior versions failed.

IGA

The IGA as proposed is terribly written and it's unclear what it is trying to accomplish. I will describe what it seems like is happening and then what I think should happen.

Briefly, I believe the current proposed IGA is seeking to replace the JOHS with a new bureaucracy and governance structure around homelessness housed in the office of the County Chair. It is trying to ensure that the County continues to receive money from the City and the City is receiving some promise of "deliverables" from the County in order to provide said funding. The JOHS will be confirmed as the County department it is and be overseen by the vague governance of the new homelessness services bureaucracy.

In more detail: Although the apparent intent in originally establishing the JOHS was that it in fact be a joint office with shared oversight, planning, funding and responsibility for homeless services between City and County, in reality it has been a County entity since its inception, with all authority vested in the County Chair. The JOHS receives funding from the City, but is not obligated to follow City directives, and in fact has often diverged significantly from policies and projects the City has wished to implement.

At this time, County leadership (the Chair and COO) have suggested that they want to retain the JOHS as exclusively a County department and they want to create a new shared homelessness response system with an entirely new governance and operational structure. Under this new structure, apparently the County will take over certain shelter functions from the City. The COO and the Chair do not want to lose funding coming from the City that would support shelter operations.

On the City side, the Mayor apparently will agree to continue providing some funding to JOHS for shelter operations, so long as the County promises certain "deliverables" around homelessness. These include (1) reducing the number of people living unsheltered by 50% (actually - placing 2699 people living unsheltered into housing or shelter by the end of 2025); and (2) increasing the number of shelter beds (currently unknown) by 1,000 (actually 445, accounting for the fact that 555 of the supposedly new beds are already bought and paid for, just not built or occupied).

In my feedback about the HRAP I explained why I believe these deliverables are a shell game and a scam. I believe the specifics around funding and deliverables should be

reconsidered, but in general this is the only aspect of the IGA that makes sense as an IGA.

There is no other item relating to the HRS or HRAP that could or should be part of an IGA. I can't understand how a legally binding agreement could be entered into based on anything related to the HRAP or HRS other than the narrow agreement around shelter deliverables in exchange for funding.

For any other matters pertaining to homelessness, the City and County can enter into separate agreements via joint statement, joint resolution, future IGA, or other mechanism as desired and appropriate.

My proposal for inclusion in an IGA:

1. The City will give the County X dollars annually for the duration of this agreement. In exchange, the County promises to take over management and operations of all TASS and SRV shelters previously funded and operated by the City.
2. I believe that the County should convey specific amounts of SHS funds to the City as determined by a formula mutually agreed to by the parties. The same for other jurisdictions in the County. This could be considered for this or a future IGA.
3. Acknowledge that the JOHS agreement will be allowed to lapse and the JOHS will be renamed to reflect that it is solely a County department.

My proposed alternative to the HRAP:

**Comprehensive Homelessness Services Approach -
A Common Sense Alternative to the HRAP**

Introduction

Homelessness is a public health, public safety and humanitarian crisis. The Multnomah County Chair and Portland Mayor's Homelessness Response Action Plan (HRAP) and Intergovernmental Agreement (IGA) (collectively the "Proposal"), seek to change the agreements between the city of Portland and Multnomah County regarding homelessness oversight, governance, and funding. They list a bunch of goals to be achieved through a hodgepodge of actions using a lot of jargon. Unfortunately, the Proposal does not offer a

solution. Rather, it recycles three decades of previous homelessness response plans, each of which failed more spectacularly than the last. But the HRAP is worse.

If we are to ever have a hope of solving the seemingly intractable issue of homelessness, we must learn from rather than repeat our mistakes. And our biggest mistake around homelessness has been a failure to establish effective leadership and governance over structurally siloed systems with fractured funding streams and intersecting responsibilities.

The City and County each play key roles in providing a continuum of homelessness supports, with the City historically overseeing infrastructure-related functions and the County supporting health and human services. Unfortunately, with different roles and responsibilities, the City and County have been unable to effectively bridge their separate yet crucially important roles to establish a shared vision and leadership structure to drive a holistic, comprehensive plan around homelessness.

The County Chair has held the most power in this dysfunctional system, and the proposed HRAP and IGA expand this authority even further. Funding has been disjointed and reactive, with an influx of hundreds of millions of dollars from the Supportive Housing Services (SHS) tax going exclusively to the County. Governance committees have been established over the years that have been led by elected officials, who can't help but respond to political pressures. And as a result, homeless policymaking has been highly transactional and project-based, driven more by politicians getting what they need to be elected than people who are impacted getting what they need to survive and thrive.

The current Proposal is a model version of this flawed approach, with a proposed governance structure dominated by elected officials rather than systems experts.

Rather than going down the same path, I believe we should be pursuing excellence through an independent and objective approach to leadership and governance. We need to create a policy-making body built on a foundation of subject matter expertise and competence. It must maximize representation and inclusion of public and private partners while reducing bureaucracy. It will need to minimize the influence of politics. And it will need to be vested with the authority to direct spending and get things done.

The good news is that we can shift our trajectory away from failure and toward success. Solving homelessness is possible - even straightforward - if we put the right leadership and governance structures in place and just get on with the work. The following will summarize some key concepts and history around homelessness, identify the major flaws of the HRAP, and offer a viable alternative.

Definitions and shared understanding

There is no shared definition for the term “homeless” and this has been a source of tremendous confusion. “Homeless” has been used to refer to people who are at risk of becoming unhoused but currently have a roof over their head; people living in temporary emergency shelters or housing; and people living unsheltered outside. For clarity, I will use the following definitions:

- **Unsheltered homelessness:** Living outside.
- **Sheltered homelessness:** Living in a setting specifically designed to temporarily improve safety compared to living outside.
- **At risk of homelessness:** Living in some form of housing that is not sustainable and can result in someone becoming episodically homeless, which in turn can transition into chronic homelessness (see below).

There are as many reasons for homelessness as there are people experiencing it. For the purpose of conceptualizing the system, however, it can be helpful to consider two broad categories of people who experience homelessness (see [ECO-NW study](#)). The two categories include:

1. **People experiencing “transitional” or “episodic” homelessness**, who do not have enough income to meet their housing cost burden, and may be one medical bill/job loss/life event away from losing their housing. These individuals often need mainly rent assistance and physical housing. but may also need low intensity supportive services such as childcare, utility assistance, workforce training and placement, or supports for living in place as they age.
2. **People experiencing “chronic” homelessness**, who have been homeless for over a year, or multiple times within a year, and experience a serious disability, including people experiencing serious mental illness and/or substance use disorder, who often need not only deeply affordable housing, but intensive supportive services to enable them to sustain that housing.

It is important to note that, if people who fall into the first “category” don’t have their needs met, they are at risk of becoming chronically homeless. The number of people experiencing chronic unsheltered homelessness in our community has grown dramatically over time.

Currently, the vast majority of people who are chronically homeless suffer from serious mental illness and/or addiction. Because regardless of why people lose their homes in the first place, the reality is that living on the streets can trigger or compound underlying mental illness and/or addiction issues. This increases their risk of injury and death, and makes it much more difficult for them to get into or sustain long term housing.

The fastest growing segment of newly homeless individuals are older adults, who often have serious disabilities, including physical ailments and cognitive challenges. The issue for these individuals is most often escalation of rent in the context of very low fixed income, and/or lack of supports allowing them to age in place.

Meanwhile, hundreds of school-age children and youth were reported as being homeless last year, exacerbating a devastating intergenerational cycle of poverty and despair.

Strategic approach to homelessness: Three pillars

Homeless services in Multnomah County and the City of Portland are largely provided through a network of community-based organizations contracted through the Joint Office of Homeless Services (JOHS). Services in theory support three key aims: (1) Preventing homelessness; (2) providing emergency shelter and safety on/off the streets; and (3) getting people into long term housing.

- The best way to “solve” homelessness is by preventing it from happening in the first place. This involves strategies such as emergency financial assistance to help with utility bills and other basic needs, short and long term rent assistance, and other mechanisms to prevent people from losing their homes.
- Shelter and emergency services are geared toward providing a safe place for people to stay while they get connected to services and, ideally, transition into permanent housing.
- Long term housing includes housing that is “deeply affordable” (accessible to households making 0-30% of median family income), “affordable” (accessible to households making 30-60% of median family income), and “supportive” (deeply affordable housing with wraparound services for people with low level needs or severe underlying disabilities, including serious mental illness and substance use disorder). It has been shown that supportive housing is the most effective permanent housing strategy for people who are experiencing chronic homelessness, but only if it is done right - with matching of individuals to the services they actually need, funding at a level that will achieve adequate service provision, and prolonged duration of support. This is a resource intensive approach, and currently this degree of support with adequate funding and

coordination (referred to as “Housing First”) is not provided consistently or effectively in Multnomah County.

Some strategies for each of the three pillars of addressing homelessness are listed below in Figure 1:

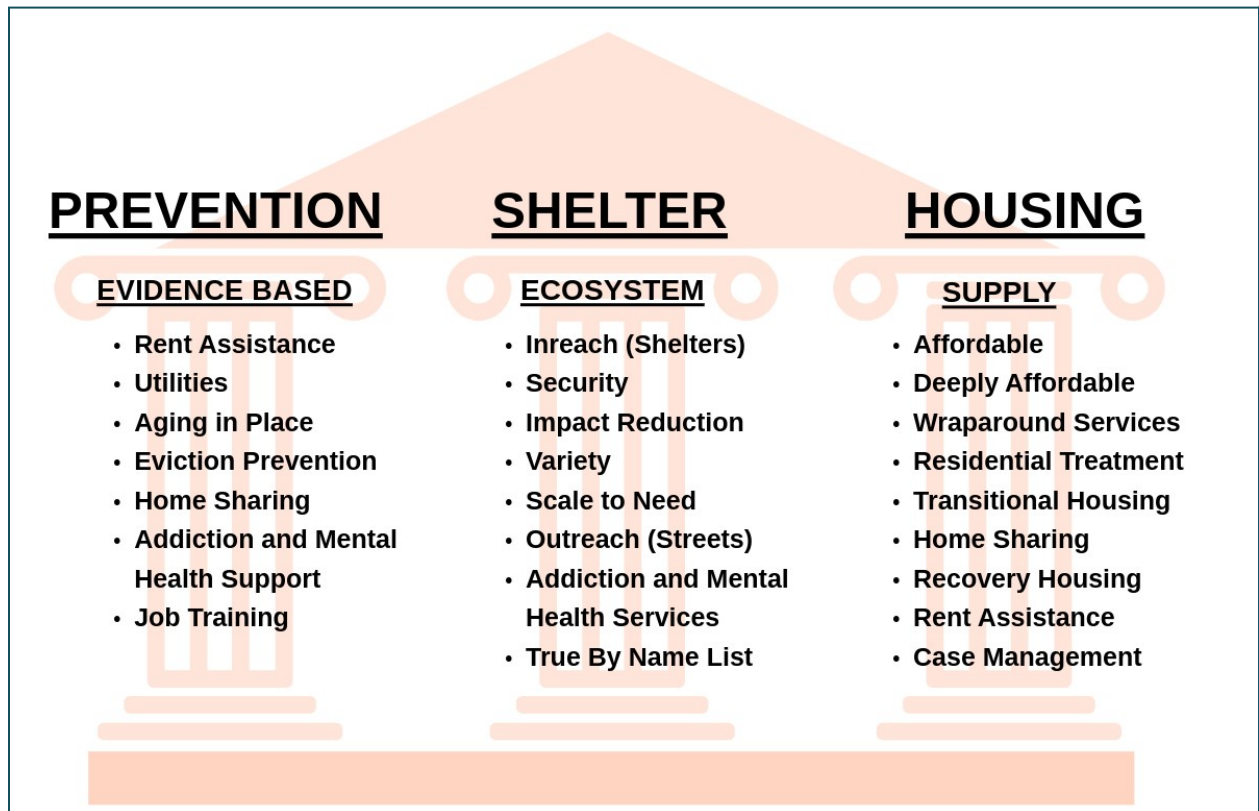


Figure 1

Allocation among these strategies is where tough budget choices must be made, because any resources expended on one of these strategies is unavailable to allocate to another strategy. For example, resources allocated to shelter will not be available to prevent a family from losing their apartment when they are unable to pay their utility bill.

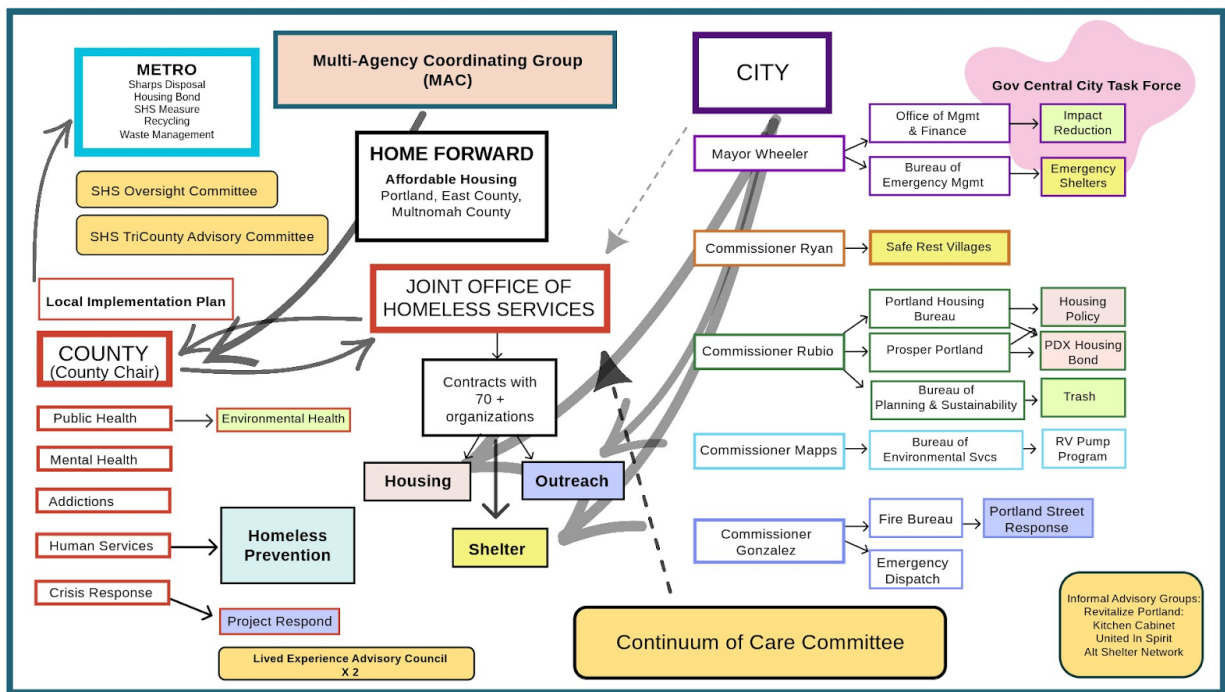
That being said, allocation of finite resources can only be optimized within a coordinated, comprehensive, holistic, functioning system with effective governance and oversight.

And a crucial component of all of this is ensuring that continuous improvement mechanisms exist that constantly measure the effectiveness and cost-effectiveness of approaches. This is currently lacking in the County’s approach to homelessness.

Multnomah County’s problem isn’t about money; it’s about lack of effective systems and governance

Fortunately, state and federal policy makers, along with voters who approved Metro's Supportive Housing Services tax (the SHS Tax), have recognized the need for commitment of substantial resources to address the homelessness crisis. Multnomah County and the City of Portland currently have over \$400 million to dedicate to addressing homelessness in the current fiscal year alone. If not enough to permanently solve homelessness, the amount should at the very least be enough to make a huge dent. The fact that it hasn't raises red flags, and circles back to lack of effective leadership, governance, and accountability in our homelessness "system".

A picture speaks a thousand words, and the following is just a partial representation of our homelessness system as it currently exists:



No plan can be developed, implemented or evaluated under this ridiculous structure of disconnect, dysfunction, and lack of accountability. But this system did not develop in a vacuum.

Four decades of ambitious and well conceived plans attempting to solve homelessness failed, each worse than the one before. This is why we are where we are and we're about to do it again

In 1988, Mayor Bud Clark released *Breaking the Cycle of Homelessness: The Portland Model*. This was followed in 2004 by *Home Again Action Plan: A Ten-year Plan to End Homelessness*; and in 2014 by *A Home For Everyone*. As stated in Bud Clark's Plan, they sought "a method to prioritize and coordinate the wide ranging needs of the diverse homeless population, to leverage funds, and to identify and rectify gaps or overlaps in service needed to break the cycle of homelessness." (*The Portland Model*, p 19)

Each of the prior plans contained some version of the following:

- A description of the history and evolution of homelessness, including the role of the federal government in creating the situation we have now through decades of disinvestment and misguided policies.
- A statement that "it took decades for this problem to develop, we shouldn't expect to see it resolve overnight"
- A recognition that the homeless population is extremely diverse, with a tremendous diversity of needs.
- An emphasis on the siloing between various local governments and identifying the need for clarification of roles and responsibilities.
- A recognition that homelessness is complex, intersecting with behavioral health, public safety, and other social and societal factors.
- An acknowledgment that homelessness is a shared problem requiring a shared solution. That there must be collaboration and coordination among City, County, and other public and private partners, including business, philanthropy, people with lived experience of homelessness, nonprofit organizations, law enforcement, courts, human service agencies, behavioral health, and more.
- An emphasis on the need for effective data management, information sharing, and analysis.

In each of the previous plans the City and County touted unprecedented collaboration and created governance structures to direct, shepherd and implement the work:

- **The Portland Model:**
 - Emergency Basic Needs Committee (EBNC) which evolved into the Community Action Agency (CAA) to establish a service delivery model for access, integration, continuity, and accountability in homeless services.
- **Home Again:**
 - Advisory Council on Homeless Issues (ACHI) to prioritize programs and projects and identify needs and gaps, leading to:

- The Citizens Commission on Homelessness (CCOH) comprising elected officials, business and community leaders, neighborhood association chairs, and persons experiencing homelessness;
 - The Plan to End Homelessness Coordinating Committee (PTEHCC). representing non-profit agencies, “mainstream” agencies (such as County Community Justice, health and mental health departments, and the Housing Authority of Portland) serving homeless people, representatives from other planning bodies, and homeless and formerly homeless people;
 - Blue Ribbon Housing Commission (BRHC), to increase the supply of affordable housing in the tri-county region.
- A Home For Everyone (AHFE coalition) strove to achieve an “ambitious vision” to “unite elected officials and people who’ve experienced homelessness with leaders from the faith, philanthropy, business and nonprofit communities around a shared vision and carefully chosen strategies in housing, employment, health, and emergency services”. It was governed by an **Executive Committee** and a **Coordinating Board**, with a number of subcommittees representing different populations and the JOHS to operationalize and implement the plans.

All of the plans set forth goals and action steps to meet the goals:

1. Breaking the Cycle of Homelessness - The Portland Model:

- Housing
- Housing management Coordinator
- Person Down
- Drug and Alcohol Treatment System - *“The alcohol and drug treatment system lacks the capacity to assure appropriate treatment when it is needed. People are sobered, detoxified and ready for long term care only to find they must wait for vacancy in those programs. This often leads to having no place to go but back to the street, with the likelihood of returning to the dependency cycle.”*
- Involuntary commitment
- Street Sanitation
- Jobs
- Case Management
- Point of access to services
- Street Safety
- Chronic mental illness treatment
- Public Participation

2. The 10-year Plan to End Homelessness - Action Plan

- Move people into housing
- Stop discharging people to homelessness
- Improve outreach to homeless people
- Increase supply of PSH
- Create Innovative New Partnerships
- Make the Rent Assistance system more effective
- Increase economic opportunity for homeless people
- Implement new data collection technology throughout the system

3. A Home For Everyone: A United Community Plan to End Homelessness

- Improve alignment of existing resources to support a more comprehensive, integrated approach to service delivery, consisting of six priority program areas:
 - Housing;
 - Income and benefits;
 - Health;
 - Survival and emergency services;
 - Access to services; and
 - System coordination.
- Coordinate investments in safety net services and permanent solutions to “break down silos” among various systems (health, community justice, mental health).
- Preserve public and private investments, with a commitment to align dollars to be used as effectively and efficiently as possible.
- Set ambitious goals and hold selves accountable to measuring and achieving them.
- Leverage additional resources among public, philanthropic, business, faith and secular nonprofit sectors.
- Identify new resources and develop proactive strategies to meet our goals
- Create the JOHS between the City and County to supposedly “combine their spending on services for people experiencing homelessness” and operationalize policies.

Each of the plans was thoughtful, informed, ambitious, and still makes sense when taken at face value. And yet they all failed. The question is why. I believe they failed because no single individual had control of or responsibility for implementation. No one created a true holistic plan for preventing and responding to homelessness and stuck to it. And no one created a governance structure that could overcome the prioritization of politics over substance.

The HRAP contains much of the same rhetoric as prior plans, including identical phrases and in some cases promising identical deliverables. For example, with AHFE, the Mayor and County Chair promised to reduce unsheltered homelessness by 50%; over the course of the plan unsheltered homelessness increased substantially and the number of people dying unsheltered reached unprecedented levels.

But the foundation, false promises, misleading data, vagueness and politicization of the HRAP are worse than any of the plans that have come before and they are poised to exacerbate the fallout. Three examples show us why:

- **False foundation.**

The HRAP claims to “build on the success of prior work” in a weak attempt to positively spin the County’s current abysmal housing placement rate of 26%. But 26% “placement” means that 74% of people in shelters are *not* moving into better situations. Whether this is an overt effort to market failure or ignorance of the failure of prior efforts, it is unacceptable.

- **Empty promises.**

Any homelessness plan must start with a clear understanding of who is on the street and what investments will most efficiently and effectively get them shelter, services and housing. A true By Name List (BNL) can be the foundation for such a plan and would contain the names of all people living unsheltered, with information about their individual housing needs and barriers. The information would be collectively analyzed and proactively guide investment, and success would be measured as each individual got off the list into a better situation.

Unfortunately none of this is happening in Portland, largely because the Joint Office of Homeless Services (JOHS) does not have a true BNL. Instead, it promises major reductions in unsheltered homelessness that it will be unable to deliver because it’s not using a list and counting down. Instead, it has seized upon an arbitrary number of people on a list at an arbitrary point in time and decided to “place” half of this number of people into shelter or housing. But not the actual people on the list - any people who become homeless in the next 2 years. People who can be rapidly housed or sheltered will be prioritized, but the chronically homeless - with serious mental illness, addiction or other disability - will remain unsheltered. The JOHS will claim success, but nothing will change for the most vulnerable dying on our streets or the systems that resulted in their being there.

- **A lack of clear data and understanding of capacity.**

Neither the City nor County have baseline data regarding how many shelter beds exist in Portland or how many are occupied at any given time. The County has published three versions of shelter numbers on its website and in its homelessness plan, yet all are different and none are accurate. Without a baseline, there can be no real way to assess how much capacity is added. And to confuse things further, the county claims that 555 shelter beds that have already been bought and paid for will count toward their alleged 1000 new bed goal.

The HRAP is substantively flawed and falls apart under basic scrutiny. But the myriad substantive and technical problems with the plan serve as a distraction from the root cause of the problem, borne out over four decades: Failed leadership and governance.

Only impeccable independent leadership and governance can drive a comprehensive, holistic solution to a multifaceted, complex, intersectional problem.

The issue of homelessness is complex, but the approach to solving it doesn't have to be. Our desired state should not be isolated sets of goals distributed among a bunch of disconnected priorities, but an effective and efficient system that can withstand changes in political ideology, addressing multiple goals of intersecting systems effectively and efficiently over time, using a finite and predefined set of resources.

Unfortunately, elected leaders have demonstrated time and again that they can't figure out how to lead this charge, regardless of how many committees they establish, goals and action items they set, or resources they have available. The common factor of all the plans that have failed has nothing to do with the substance of the plans - they are remarkably similar and continue to make sense. Rather, all the governance structures have been dominated by politicians who, in many but not all cases and despite best intentions, have not had a true understanding of homelessness, and often focused more on individual programs and projects and getting elected than changing our system and perhaps going against the political grain.

It's time to demand a structure where an independent body of experts with a dedicated non-political leader is given the authority to make crucial decisions around City and County homeless policy and direct investments. It's not too late to do the right thing, but time is running out for those who need our help. Those who do not learn from history are doomed to repeat it.

Fool us once, shame on you. Fool us twice, thrice, and a fourth time - shame on us. We're allowing too much time and money to be wasted - time and money we desperately need to use to save our city and get its residents safely off the streets.

Immediate action items:

1. **Establish an independent governance structure** that is composed of substantively informed leaders and led by a single, accountable subject matter expert, selected through a transparent process based on objective criteria. This governance team should be as independent of politics as possible and be responsible for creating a comprehensive holistic framework for a homelessness system of prevention, shelter and housing. See *Figure 2*, below.
 - a. This can be accomplished by joint Resolutions passed by both the City and County, with technical details such as salaries, funding, and contracts, formalized in an IGA as needed.
 - b. Appoint a Director of Implementation (Director) no later than June 30, 2024.
 - i. The Director will be appointed through a collaborative process between the Mayor and Chair based on predetermined objective criteria demonstrating subject matter expertise in homelessness systems and operations, as well as leadership skills.
 - ii. The Director will be confirmed by a supermajority of both City Council and County Commission.
 - iii. The appointee must not hold elected office at the time of appointment and must not be employed by any organization represented in the homelessness continuum of care. Actual or apparent conflict of interest must be avoided.
 - iv. The Director's salary will be jointly agreed upon by the City and County, paid jointly by the City and County for the first two (2) years, and be re-evaluated with potential adjustment in amount and mechanism of payment after two years.
 - v. The Director will report jointly to the Mayor and Chair and any substantive communications will be promptly shared with all City Councilors and County Commissioners.
 - vi. The Director will oversee three working committees: (1) Steering Committee; (2) Community Advisory Coalition; and (3) Operations/Implementation Committee.
 - c. Establish the Steering Committee, Community Advisory Coalition, and Operations/Implementation Committees (collectively "Committees") no later than June 30, 2024. Each Committee will have independent Charters the Committees themselves will develop, with guidance and support from the City and County.



Figure 2

1. **Formally clarify that the Joint Office of Homeless Services is exclusively a County department and have the County change the department name by replacing the term “Joint” with the name “Multnomah County.”** Additional changes to any roles and responsibilities of the JOHS can be accomplished through joint City-County Resolution, IGA, or other formal mechanism of agreement, as deemed appropriate. This must occur by 12/31/24.
2. **Urgently and proactively catalog the baseline status of homelessness and services in Multnomah County. We can’t understand the scope and depth of the problem, and hence respond to it, unless we actually measure it.**
 - a. Create a list of individuals that includes their names, where they are currently living, what they need to be sheltered or housed, and what their barriers are. Establish a dedicated team of outreach workers, harness volunteers and neighborhood associations, create a grid, use technology - apps, ipads, etc - and count. Hire two limited duration full time staff for one year to create and shepherd this By Name List effort.

- ## Conclusion.

Review of the prior plans suggests that none were able to transcend the structural challenge of having siloed City and County governments, with fragmentation of authority and funding streams in the context of shared responsibility and lack of accountability. This was compounded by political tensions and incentives to push individual programs and projects based on political expediency. And at the heart of each plan was a governance structure dominated by politicians.

We need to establish a different paradigm of governance, driven by subject matter expertise and led by an independent individual not beholden to a political office. Achieving the goal is

not the hard part - the solution is complex but straightforward and there are a number of ways we can move forward. The hard part is making the decision to take a different path. It's time we started heading in the right direction.