

February 12, 2018

Regulations Division, Office of General Counsel
Department of Housing and Urban Development
451 7th Street SW., Room 10276
Washington, DC 20410-0500

FR-6069-N-01 Public comment on Advanced Notice of EnVision Center Demonstration

The National Housing Conference (NHC) welcomes the opportunity to comment on Secretary Carson's new initiative to explore effective collaboration across sectors to better facilitate economic mobility for low-income households living in HUD- assisted housing. NHC supports creating centralized locations, Envision Centers, where families can access supportive services meeting a breadth of needs in one place. We appreciate HUD's willingness to review comments on this initiative and share HUD's commitment to ensuring low-income households have equal access to opportunity. We submit these comments in support of Envision Centers and offer suggestions to further strengthen the proposal.

I. About the National Housing Conference

Everyone in America should have equal opportunity to live in a quality, affordable home in a thriving community. The National Housing Conference educates decision makers and the public about housing policies and practices to move housing forward together. NHC convenes and collaborates with our diverse membership and the broader housing and community development sectors to advance our policy, research and communications initiatives to effect positive change at the federal, state and local levels. NHC has been defending the American Home since 1931. We are a nonpartisan, 501(c)3 nonprofit organization. NHC's research team operated as the Center for Housing Policy until the organizations merged in 2013.

II. Recommendations for implementation

NHC supports the premise for EnVision Centers that financial support alone is insufficient to solve the problem of poverty; that a holistic approach is needed to ensure long-lasting self-sufficiency. Having EnVision Centers focus on economic empowerment, educational achievement, health and wellness, and character and leadership recognizes that often low-income families have multiple barriers to overcome in their journey to self-sufficiency. The four pillars model offers HUD the opportunity to build on successful programs already in its portfolio and incorporate them into Envision Centers, like Jobs Plus, Family Self Sufficiency (FSS) and ConnectHome. Additionally, many PHAs and housing providers partner with schools and nonprofits that offer after school programs for children and teens like Eden Housing.¹ Others have ongoing partnerships with health

¹ Supporting Educational Achievement with Afterschool Programs Located in Affordable Housing. Viveiros, Janet. National Housing Conference. December 2016. <https://www.nhc.org/publication/supporting-educational-achievement-with-afterschool-programs-located-in-affordable-housing/>

providers to improve the health of their residents like Chicanos Por La Causa.² PHAs and housing providers also partner with community organizations like Chicago's effort to link public libraries with public housing developments. Communities participating in ConnectHome may offer models around utilizing online education and workforce training programs as well as digital literacy training that can lead to employment. All of these efforts offer helpful models and lessons that NHC encourages HUD to consider as HUD moves forward with the implementation of EnVision Centers.

Focusing the demonstration on communities that already participate in collaborative efforts makes sense. These efforts include, but are not limited to, the Promise Zones program, Moving to Work Demonstration, the Byrne Criminal Justice Innovation program, JobsPlus program, Family Self-Sufficiency program and the Resident Opportunities and Self-Sufficiency (ROSS) program; and the ConnectHome program. These communities have already demonstrated a commitment to collaboration and expanding the opportunities available to low-income households and probably have strong partnerships in place to build upon. In the future, NHC would encourage HUD to explore providing resources and technical assistance for communities who have not met this requirement so those communities are not left behind and are able to receive support to explore how they could develop new partnerships and programs to empower their residents.

III. Specific areas where HUD is seeking comment

NHC would also like to provide feedback on some of the specific areas where HUD is seeking comment.

A. Economic mobility

In terms of defining economic mobility, HUD should allow for a range of metrics and flexibility. Many indicators can show a family is moving in an upward direction, from paying down debt to learning budgeting skills, to getting employed, and/or pursuing additional employment training or education. HUD should not be overly narrow in defining economic mobility.

B. Resident participation

One way to ensure the economic empowerment pillar focuses on residents that are able to work is to make participation voluntary similar to the FSS program. This ensures that participating families and residents are able to work and motivated to make positive changes. However, HUD could expand economic empowerment to focus on all residents, because even residents unable to work full-time because of age or disability would benefit from learning how to budget, finding ways to save, and other financial strategies that would be helpful. Funding for additional FSS service coordinators and/or case managers of EnVision Centers to help reach families and residents who may have more extensive challenges preventing them from economic empowerment like physical or mental health issues, childcare needs, etc., but who want to work is critical to engage these residents.

² Investing in Affordable Housing to Promote Community Health. Viveiros, Janet. National Housing Conference. December 2016. <https://www.nhc.org/publication/investing-in-affordable-housing-to-promote-community-health/>

C. Maximize existing programs

To maximize existing programs and encourage a coordinated and holistic approach, HUD could provide resources on the current benefits available through existing programs (funding, technical assistance, etc.) as well as eligibility and requirements across the existing programs to both local leadership and PHA staff. This effort could also involve outreach and education to residents. Then HUD could undertake a streamlining effort to ensure that communities can better utilize existing programs for more families.

Additionally, EnVision Centers will require robust community partnerships to be successful. Through existing programs, PHAs probably already work with a number of partners, but those partnerships could be strengthened and new partners could be identified. Funding for the time involved for partnership outreach and engaging with multiple organizations in intensive collaboration would ensure that this critical work gets done. If funding is not available through HUD, the department could help selected communities engage with philanthropic and corporate entities to fund these efforts. Creating a coordinated holistic approach across entities and programs will require much effort and involve identifying duplication as well as areas where efficiency could be achieved. Without financial support to encourage those efforts, that collaboration may be difficult to achieve and maintain.

D. Overcoming impediments

Impediments exist at the local level to achieving the four pillars. Perhaps the community lacks a strong hospital or health provider to partner with in the health and wellness pillar. A public housing agency may not have the staffing support necessary to undertake additional programming and instead, look to better coordinate and strengthen its existing programs. This approach would still be beneficial and lead to positive outcomes for residents. Ideally, communities that are chosen for the demonstration project should be pursuing all four pillars. However, HUD should allow for situations where significant barriers will prevent including a specific pillar. Family support is one pillar HUD could consider as part of its EnVision Center demonstration. Ensuring that young families and single parent households have access to parenting resources and affordable high-quality childcare is important to ensuring economic mobility for low-income families. HUD could also explore how to translate the community support for work element of Jobs Plus into the EnVision Center model and include a focus on childcare.

E. Past successful incentives and programs

By focusing on communities that are already participating in collaborative efforts like FSS and Jobs Plus, HUD has already identified a number of incentives and programs that have worked well in the past at improving the quality of life for low-income individuals and families. For example, graduates of the Family Self-Sufficiency program, according to a 2011 HUD PD&R study³, increased their incomes by \$13,000 on average over a four year period, a 17% increase in income. FSS graduates who choose to build savings in their escrow account achieve an average balance of \$6,500 and 34% of graduates choose to leave housing assistance within one year of graduation.

As HUD considers the implementation of EnVision Centers, it should explore how to strengthen and expand FSS programs and build on those existing partnerships. A recent study on the FSS model that

³ Evaluation of the Family Self-Sufficiency program. Abt Associates. March 2011
https://www.huduser.gov/portal/publications/affhsg/eval_fssp.html

Compass Working Capital and Preservation of Affordable Housing have implemented highlights the need for more information sharing between practitioners and more technical assistance on how to implement robust FSS programs. This study also provides a model for establishing financial education programs, based on Compass' success in working with the Cambridge Housing Authority as well as private multifamily owners.⁴

HUD should also look at how FSS and Jobs Plus treat household incomes. In FSS, instead of having to pay a higher rent because of a growth in income, families can save that amount in an escrow account, removing a disincentive to earn a greater income. Jobs Plus has a similar earned income disregard piece which is essential for encouraging work and greater employment. Looking at ways to encourage income growth and not tying income growth to greater rents should be part of the economic empowerment pillar.

Additionally, many of these programs have benefited from robust research and evaluation which outline lessons learned and areas for improvement. This robust research and evaluation should be applied to EnVision Centers in the early planning and implementation stages. HUD PD&R recently released an interim report on the Jobs Plus Pilot program which highlights the need for an individualized approach to employment services for participants, the need for stronger partnership with employers and the business community, for robust technical assistance for public housing agencies, and more focus on strengthening community support for work.⁵ These findings could be areas of focus for EnVision Center communities in the economic empowerment pillar.

F. Quality of life for residents

The majority of residents of HUD-assisted housing are elderly or disabled; their ability to achieve financial independence and move out of assisted housing is unlikely. However, these residents would still benefit from improved health and personal wellness as well as financial literacy skills and educational engagement. These services would help stabilize these residents, save on healthcare costs, and ensure their highest quality of life. Programs at EnVision Centers should not just focus on those residents that are able to work but providing programs and services that improve the quality of life for all residents.

⁴ Promoting Economic Mobility in Multifamily Housing. Compass Working Capital and Preservation of Affordable Housing. January 2018. <https://view.publitas.com/preservation-of-affordable-housing/promoting-economic-mobility-in-multifamily-housing-initial-outcomes-from-family-self-sufficiency-programs/page/1>

⁵ Scaling Up a Place-Based Employment Program: Highlights From the Jobs Plus Pilot Program Evaluation. MDRC, UNC Chapel Hill and Case Western Reserve University. Prepared for HUD PD&R. September 2017. https://www.huduser.gov/portal/publications/JobsPlus_InterimRpt.html



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IV. Conclusion

NHC supports Secretary Carson's efforts to create EnVision Centers and stands ready to assist HUD, PHAs, and communities to help achieve access to opportunity for all. To discuss any of these comments in further detail, please contact Rebekah King, Acting Director of Policy, National Housing Conference, (202) 466-2121 x248, rking@nhc.org.

Sincerely,

A handwritten signature in black ink that reads "David M. Dworkin". The signature is written in a cursive style.

David M. Dworkin
President and CEO